

PUBLIC COMMENT SUMMARY REPORT

**Draft Commercial Services Plan /
Environmental Assessment
Haleakalā National Park
Maui, Hawaii**

FEBRUARY 12, 2013

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1.0 INTRODUCTION

This public comment report incorporates comments received by the National Park Service (NPS) during the 60-day public comment period (June 28–August 31, 2012) related to the development of the *Draft Commercial Services Plan / Environmental Assessment* for Haleakalā National Park.

Three public meetings were held on August 15, 16 and 17, 2012, in Pukalani, Hāna, and Kīpahulu (Maui County, Hawaii). The public was notified about the meetings by announcements placed on the park's website, press releases sent to the park's media contact list which includes local newspapers and radio stations, and by letter accompanying the Draft Commercial Services Plan, which was mailed on June 28, 2012.

2.0 PUBLIC COMMENT PROCESS

2.1 GOALS AND OBJECTIVES

The objective of the public comment process was to solicit comments and encourage public participation in the *Draft Commercial Services Plan / Environmental Assessment* for Haleakalā National Park, Hawaii. The focus of the plan is on providing direction for management of commercial services in the park over the next 10–15 years; determining the levels and types of commercial tour services that are appropriate and compatible with the park’s mission; determining how to ensure high quality experiences for visitors; and establishing guidelines for identifying, regulating, and minimizing the effects of commercial services on park resources.

2.2 NOTIFICATION PROCESS

A letter accompanying the draft plan was sent on June 28, 2012 to 213 people on the mailing list provided by the park. The letter invited the public to participate via three different methods: attend one of the scheduled public meetings, provide written comments by mail, and submit written comments through the park’s website.

A comment form was also provided at the public meetings that asked the following questions:

1. What aspects do you like about the preferred alternative in this draft commercial services plan?
2. Do you have any suggestions for improving or strengthening the preferred alternative? If so, what are they?
3. Do you have any other comments related to this draft commercial services plan?

2.3 PUBLIC MEETINGS

Meeting notices for three public meetings were published by the National Park Service on the Haleakalā National Park website at (<http://www.nps.gov/hale/parkmgmt/csp.htm>) and the Planning, Environment, and Public Comment (PEPC) website (<http://www.parkplanning.nps.gov/hale>). Press releases inviting the public to attend the public meetings were sent to the local newspapers and radio stations for announcement. The meeting dates and locations were also published in the letter that was mailed out in June, 2012. The three public meetings for the project were held on August 15, 16, and 17, 2012.

Each public meeting was conducted using an open house format. Superintendent Sarah Creachbaum delivered a brief presentation, explaining the goals for the meeting and providing an overview of the plan. Several stations were set up around the room designed to spark discussion and encourage comment on a different aspect of the plan. National Park Service staff manned each station, so that the public was able to ask questions and engage in direct conversation with knowledgeable personnel. National Park Service personnel also recorded comments on flip-charts.

A total of 90 people signed the attendance sheets at the three meetings.

2.4 DEMOGRAPHICS

There were a total of 111 individual correspondences submitted during the public comment process; however, one was a duplicate correspondence submitted by the same person. All correspondences were recorded in the NPS Planning, Environment and Public Comment (PEPC) website database. Not all of the people who participated in the process indicated where they were from except for country. Ninety-four (94) of the

participants identified themselves as residents of Hawaii; the remaining six (6) were from out of state. Table 1 below identifies where the participants were from and the number of participants.

TABLE 1. RESIDENCE OF COMMENTERS

State	Country	# Participants
HI	USA	94
Unknown	USA	9
TX	USA	2
AZ	USA	1
FL	USA	1
SC	USA	1
WA	USA	1
Unknown	Canada	1
Total		110

2.5 PUBLIC COMMENT METHOD

Correspondences were received from the public during the meetings and the comment period that ended August 31, 2012. Correspondence was received through the PEPC website (47), letters (45), completed comment forms (11), e-mails (4), and through a transcript of the flip chart notes recorded at the public meetings (1). Two form letters were received from the public. One form letter had 3 correspondences associated with it; the other had 8 correspondences associated with it.

3.0 SUMMARY OF COMMENTS

The following discussion contains summaries of the comments received from the public. The comments are summarized and organized by topic and PEPC Code number. Some of the comments received were related to only one topic, while others addressed multiple topics, and therefore have been tallied more than once in the sub-sections presented below. Representative comments are quoted in each topic category in order to provide examples of the types of comments received. The representative comments are quoted exactly as submitted by the commenter. An ellipsis or three periods (...) indicates where words from the original statement have been omitted for brevity. Appendix A contains copies of all comments received during the public comment process, including those that fall outside the scope of the plan.

3.1 Alternatives and Alternative Elements

Alternatives: General Comments (PEPC Code # AL5000)

A total of 52 commenters expressed support for or opposition to the alternatives and elements of the alternatives presented in the draft plan:

- Alternative A (No Action Alternative) – no change in management of existing commercial tours;
- Alternative B (Preferred Alternative) – maintains current types of commercial services, however, the number of providers and trips per day would be limited and commercial tours would be prohibited in the park three to five days per year;
- Alternative C – maintains current types of commercial services while imposing stricter limits on the number of commercial providers and group size than Alternative B. There would be no prohibition on the days when commercial tours could operate; and
- Alternative D – increases the levels and range of current commercial services, although there would be some limits on the growth of commercial visitation.

Representative Comments:

“...I have to say that I most prefer Alternative #1, NO CHANGE ACTION...The many options that are offered are there because there is demand from the public for the experience.”

“I believe a plan of Action (Plan B) to be best for the environment of the park.”

“I support the NPS preferred alternative in the draft commercial services plan as a nice balance between the public enjoyment of the park, the use of the resource, and the support of commercial revenue and services to the park.”

“After reviewing the alternative future plans for Haleakala, Plan C appeals to me the most - fewer bicycles and fewer tours - I strongly feel we should listen to the Native Hawaiians advice on the proper use of this very spiritual area and not base the future of Haleakala on financial concerns - Maui can survive without major income from Haleakala.”

“Option 'D' is by far the preferable choice...I do not find the commercial tours to be in any way a major nuisance. They provide access to the Park that otherwise would not be available to less adventurous tourists. Not only should these commercial tours not be restricted, they should be expanded.”

“Sensible precautions as outlined in the bike tour provisions of Alternative D are fine.”

“Alternatives C and D are too restrictive...”

"I like that the preferred alternative plan will reduce the number of large 3-axle busses that clog the narrow roads throughout our park. Busses disturb the peaceful atmosphere because they produce excessive noise and air pollution. They also block the roads causing traffic problems and blocking emergency vehicle access."

"I contend that the removal of motor-coaches or the restriction of commercial services within the park will have a detrimental effect on the park."

"Limiting commercial visitors doesn't increase the protection & preservation of this national resource."

"It can be a good thing to set aside a few days a year for Native Hawaiians to visit."

"The proposed commercial services plan encourages greater access for more people into areas of the park not easily accessible presently."

Alternatives: New Alternatives or Elements (PEPC Code # AL4000)

A total of 33 commenters presented new alternatives for consideration or new elements that potentially could be included within an existing alternative. These suggestions included ideas for new tours, ways to modify the proposed permitting system, and considerations for enhancing mitigation measures and resource protection.

Representative Comments:

"You don't need to drop down to 4 concessions, but you don't have to issue out limitless CUAs. 12, 15, 20 CUAs TOTAL (including Hike, Horse, Astro)."

"In reading the draft and listening in on our gatherings/meetings, I believe that having a Concession Permit for both the Summit and Kipahulu would be problematic. Both areas have so many differences in both cultural and natural resources that it would be difficult to educate the land based tours on both to the level that is much needed. I believe having separate permits would be more correct."

"Competition creates quality services. More concessions results in businesses having to work harder to obtain clients. With only 4 concessions there is little incentive to go above and beyond with services because they have no competition."

"The mix and quantity of tours should be driven by the market. If there are fewer tours available, then visitors will certainly find other ways to enjoy the park. The benefit of organized tours include the fact that they provide valuable education in regard to the "dos" and "don'ts" of enjoying the park, and history lessons about our kuleana to respect and care for this very precious area. Eliminating the amount of organized tours will increase traffic of individual vehicles with greater numbers of uneducated visitors traipsing through the park."

"We urge maximizing the number of days when Commercial Services in the Park would be prohibited, to let the aina refresh itself, and to let the local community and the Native Hawaiians use the Park for gathering and ceremonies without being overwhelmed by the number of visitors."

"I would definitely like to see the inclusion of companies who use ecologically friendly technologies such as hybrid electric vehicles. This will reduce noise and emissions."

"It should be noted that some of the Hana Road is very Narrow. Limiting tour vehicles less than 13500 GVW would minimize the impact to those who live and travel the Hana Road on a regular Basis."

"We do not agree with limiting the number of commercial use providers for road-based tours. That action would discriminate against smaller operators like us that provide specialized services to specific markets that

bigger companies do not address, as they don't have the human resources that we have and they will not do it either because for them it would not be cost-effective."

"We think that individual visitors need be regulated too."

"What we PROPOSE is putting a system in place that allows ACCESS to the Crater to All certified CUA Holders by an Advance Reservation System. This would allow Occasional Users, like us, ACCESS when the need arises."

"I would like to see the Park support limited commercial "uphill" bike tours, such as Go Cycling Maui."

3.2 CONSULTATION AND COORDINATION

Consultation and Coordination: General Comments (PEPC Code # CC1000)

Two commenters provided information regarding consultation and coordination. One commenter was the U.S. Fish and Wildlife Service (USFWS) who confirmed that they reviewed the *Draft Commercial Service Plan / Environmental Assessment* under the National Environmental Policy Act and Section 7 of the Endangered Species Act (ESA). USFWS also clarified that they are currently engaged with the National Park Service in informal consultation under Section 7 of the ESA, and that together they will finalize the necessary information to initiate formal consultation in the future. The other commenter proposed that:

Representative Comments:

"...any new commercial application be reviewed by the Kapuna group that meets with the Park Superintendent and with the communities of Kipahulu, Kaupo, and Hana. We live in a small community with limited resources and a narrow, barely maintained road. All commercial services have a large impact here."

3.3 IMPACT ANALYSIS

Impact Analysis: Impact Analyses (PEPC Code # GA1000)

A total of eight commenters, including USFWS, presented information regarding the impact analysis of topics such as public health and safety and natural resources, as well as the accuracy of the impact analysis.

Representative Comments:

"Why is it that many many Roadbased tours will lose their business, when hiking and horseback tours probably do the most damage to the park and it's environment."

"I think it is important to understand how our/NPS decisions can affect the Hana Road communities and not have the same affect the communities up to HNP summit."

"Also concerning our footprint with regard to resources, our Gray Line Motor coaches as equipped with restrooms. Although currently disabled, we will restore them immediately if you agree that this would be yet another added benefit for resource conservation...Environmentally, this would save hundreds of gallons of water daily."

"...the Draft EA underestimates the impact of commercial services to individual plants of listed species and designated critical habitat. Significantly, NPS has made a "no effect" determination in all Alternatives for designated critical habitat of both the Haleakala silversword and Nohoanu...We recommend the Final EA address this inconsistency."

“Table 21 of the Draft EA defines impact thresholds that are then used in Chapter 4 to evaluate the environmental consequences of each proposed Alternative Action. It appears the threshold definitions in the Draft EA are intended to be used consistent with ESA definitions. However, the Draft EA categorizes all Alternatives as likely to continue to affect each of the four analyzed species...Per the ESA and corresponding regulations, take of just one individual of an animal species equates to a determination of “likely to adversely affect.” Therefore, loss of a nest or an individual would lead to a likely to adversely affect determination and should correspond to a “major” impact rather than the stated minor impact pursuant to the threshold definitions. We recommend revising this inconsistency in the Final EA.”

“Vans and buses are too wide for Kipahulu community roads.”

“According to the NHTSA (National Highway Traffic Safety Administration) database, there were 104 fatal crashes in the County of Maui in the 5 year span from 2004-2008. One (& only one) of those 104 crashes involved a category 3 vehicle (large truck or bus).”

3.4 ISSUES

Issues: Park Management Issues (PEPC Code # IP100)

One commenter, the State of Hawaii Department of Health–Maui District Health Office, noted that a food establishment permit is required if any commercial concession distributes or sells food.

Issues: Visitor Use or Experience Issues (PEPC Code # IV100)

A total of three commenters provided observations about the quality of visitor experience and types of visitor use, as well possible cost differences between use of smaller vans and mini buses versus motor coaches.

Representative Comments:

“The Summit and Oheo Gulch are destinations for our visitor, for most, this are the main reasons people come to Maui. We also understand that we are near a saturation point for these areas. This year we have made a decision not to add any more vans to our fleet, we have capped the number of people we will take on tour per day, like the NPS, concern for our visitor experience is important.”

“A group of 55 visitors wishing to charter a Motor Coach would be required to charter 3 Mini Buses in place of the 1 Coach, should Coaches be disallowed from the Summit. This would incur a 60% price increase for the visitors from approximately \$1,478.20 to \$3,714.36 per trip...Many visitors would be discouraged if the rates increased so dramatically and may opt to drive on their own if possible, or forego visiting the Park all together.”

“The cost per person would be greater and more protection of the resource would be gained from this niche market that would utilized smaller and more comfortable 8 passenger vans, Protecting and informing 8 guest about the National Park versus 25 guests is a huge difference in the quality of experience that these niche guests would receive and require.”

3.5 MISCELLANEOUS TOPICS

Miscellaneous Topics: General Comments (PEPC Code # MT1000)

A total of 82 commenters submitted remarks on a variety of topics that fall outside the scope of the commercial services plan or were endorsements of current commercial services. For informational purposes these comments are included in Appendix A. The comments received under this category may be addressed by park management separately.

3.6 OTHER NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) ISSUES

Other NEPA: General Comments (PEPC Code # ON1000)

A total of nine commenters expressed concerns about the NEPA process and elements presented or not presented in the Environmental Assessment.

Representative Comments:

“...they’ve put Alt. B in the perfect position to be accepted, even if it is still way off the mark. The problem I have is that this plan does not offer any real compromise. It’s one extreme or another. The preferred plan will essential put 25+ companies out of business.”

“...portions of the CSP are worded in such a way to make Alternative A an undesirable option... The park not only has the ability, but has the responsibility to limit CUAs. So there is NO option that allows UNLIMITED commercial services.”

“Whatever decision is made, it is important to express concern of how much time is needed to adjust to new operations. Whether our company is awarded a concession or not, there must be suitable time in order to adapt and make modifications to business operations”.

“Minibuses at Kipahulu need to be evaluated for the number of visitors and their impact on natural and cultural resources, and for public safety due to narrow and winding roads along Highway 330.”

3.7 PURPOSE AND NEED

Purpose and Need: Scope of the Analysis (PEPC Code # PN3000)

Two commenters provided input on what was addressed or not addressed in the scope of the analysis of the draft plan.

Representative Comments:

“The Draft Commercial Services Plan does not appear to cover taxicab service in the Park, which has been a subject of confusion for both taxi drivers and park personnel. You will recall that there is currently in effect a letter of understanding...allowing taxis to enter the park on the same basis as other passenger cars for up to five visits per year. I suggest this policy be formalized in the Commercials Services Plan, or that the Plan specify that taxis are exempt from all commercial use provisions.”

“To protect the natural and cultural resources where the non-wilderness Park lands extend south to the coastline the Department would recommend that the scope be increased to provide restrictions, or prohibition, on all commercial activities in these non-wilderness park areas: 1) along Highway 330 east of Kaupo,

enclosing Alelele and Lelekea Streams, and 2) Pi'ilani Highway 31 west of Kaupo near Mamalu Bay. With commercial service and activities being reduced under Alternative 8, commercial service providers may expand tours to these areas, which would most likely have detrimental impacts to cultural and natural resources, and public safety."

Purpose and Need: Objectives in Taking Action (PEPC Code # PN8000)

A total of three commenters provided observations related to the stated objectives in taking action in the draft plan.

Representative Comments:

"The 2005 Commercial Use at sunrise & 2007 safety stand down are great examples of quick change. From reading the CSP and looking at the data, it would appear that most of the negative symptoms within the park's jurisdiction regarding commercial activities have been eliminated as a result of these actions."

"Reducing the number of commercial visitors to the park will not necessarily reduce the number of visitors to the park to any significant degree. Approximately 80% of the visitors to the park are not on commercial vehicles. Of the commercial visitors to the park, a majority would be capable of driving to the park if commercial services are limited."

Purpose and Need: Issues and Impact Topics Selected for Analyses (PEPC Code # PN9000)

Two commenters provided information about the issues and impact topics selected for or dismissed from analysis in the draft plan. Comments were related to public health and safety, sustainability and climate change, soundscapes, air quality, and natural or depletable resource requirements and conservation.

Representative Comments:

"In reference to excerpts from page 25 regarding climate change and sustainability and page 27 regarding preservation of soundscapes...I strongly believe we are able make a positive impact in these areas: a. We have discussed previously that running one Mini Bus is more environmentally friendly than running several cars. On a larger scale and in the same tangent, with a significant sized group traveling together it still takes 3 Mini Buses to accommodate the amount of passengers that just 1 Motor Coach can. Running the three Mini Buses on a 100mile trip would result in an approximate 12 gallon fuel burning increase and approximately 30% in increased emissions."

"...As directed by Management Policies 2006, the National Park Service strives to minimize the short- and long-term, environmental impacts of development and other activities through resource conservation, recycling, waste minimization...the C.S.P. indicates this topic was dismissed from further analysis...A motor-coach with a working toilet on board could have an impact the water usage in the park by reducing the number of people that use the toilets in the park. In addition, the motor-coaches remove the waste material from the park when they drive away. This would result in less effluent impacting the septic systems in the park."

"There seems to be a common misconception that buses are dangerous. According to data from the National Highway Traffic Administration (N.H.T.S.A.), buses appear to be the safest mode of highway transportation."

3.8 SOCIOECONOMICS

Socioeconomics: Impact of Proposal and Alternatives (PEPC Code # SE4000)

A total of 13 commenters were received on the socioeconomic effects of the plan. Many commenters suggested that implementation of the NPS preferred alternative would result in adverse impacts for tour guides and operators, tour clients, and the Maui economy. Several expressed strong concern over the potential for loss of their job, business, and the resulting impacts on their lives due to implementation of the plan. Commenters also suggested that many other jobs would be lost, such as those in the restaurant and retail industries.

Some noted that bicycle tour companies may be impacted to a greater degree than other road-based tour companies. Commenters also found it inequitable to restrict commercial operators without making efforts to manage private vehicles, both of which contribute to congestion.

Some indicated that tours will become more expensive for businesses and customers due to restrictions on tour bus size and educational requirements for tour guides. Another commenter suggested that dispersing visitor times will become more difficult with fewer road-based tour contracts. One commenter questioned the previously made decision to not allow occasional access to tour operators. One commenter suggested making efforts to forge stronger partnerships with local entrepreneurs.

Representative Comments:

“The bottom line is that things are not THAT bad as is right now. Not to the point that you need to clean house and put 15 established, family owned, local businesses out of business. CUAs can be limited. CUAs can be managed. Please consider these options. I am disappointed with the alternatives as they don't present a true study of the available options. Do not put these companies out of business. The Park is essential to their activities...Dozens of companies, hundreds of jobs, and millions of dollars for the local economy are at stake here.”

“If you want to go forward with your preferred Alternative B please keep in mind that tours will become more expensive.”

“We will survive no matter what the outcome is, it will just change the number of people we have in our employ...There are people who provide us with Breakfast, Lunch and other services that are small and local, they could not provide these services to a larger company. Some are solely dependent on us to provide them income.”

“Akina Aloha Tours is not a high volume user of Halekale National Park at Sunrise...In an attempt to control the over-crowding and congestion, it was decided that the simple solution was to limit ACCESS. Of the four Tour Bus Companies on Maui, Akina Aloha Tours is the only one EXCLUDED from the Crater at Sunrise. How is this fair or equitable? Because we did not have any Sunrise business during a specific time period of the Park Service's choosing Akina was eliminated from Sunrise access? This was a VERY simple solution for the person-in-charge, but a devastating decision for Akina Aloha Tours...Our main concern and over-riding issue is one of ACCESS. We want continued access to Haleakale when the need arises for us.”

“...7 of the 19 CUAs (are road based with bicycle option)...As per Table 18 page 120 and page 191 - 68% of their total revenue is attributable to the Park...Forcing these 7 CUAs (road based with bicycle option) to compete with the other 12 CUAs (who attribute 23% or less of their revenue to the Park) for the 4 Concession Contracts is extremely harsh and will put most (if not all of them) out of business.”

“It is agreed that the tour guide education program suggested would be beneficial to all - it must be remembered that it will again be the business owners that will bear the brunt of the cost of this education. Not

only by having to pay their employees to attend the classes, but also by paying the cost of the Park educators through the raised fees to the Park or through franchise fees.”

“Negative impacts on commercial groups, without better attempts at controlling private vehicle use seem unfair. They constitute a valuable source of meaningful jobs to the "local" as well as native population, especially in this time of lowered opportunity.”

APPENDIX A

The information provided below is the full text of the comments provided during the public review of the *Draft Commercial Services Plan / Environmental Assessment*. These comments are sorted by category and correspondence id number.

CodeID	Code	Comment	CorrespondenceID
AL4000	Alternatives: New Alternatives Or Elements	<p>My revisions on Alt. A:</p> <p>Put a LIMIT ON CUAs. You don't need to drop down to 4 concessions, but you don't have to issue out limitless CUAs. 12, 15, 20 CUAs TOTAL (including Hike, Horse, Astro). That's not too difficult to manage right? I mean with Alternative B, you still have 4 concessions and 12 CUAs to manage.</p> <p>Worried about the frequency of applying CUAs? Make the contracts longer. 5-10 years, what's wrong with that? There are a lot of really good, well behaved, established current CUA holders. Some of these business have dealt with the park for 20 years, why should the park put a stop to that if they've done nothing but be cooperative with the park for that time?</p> <p>Hold CUAs to a high standard, make the application process thorough, enforce rules. You can ensure that a group of CUAs are playing nice, without putting 15+ of them out of business. Offer that same training to CUAs that you recommend in Alternative B. I don't understand why training is only available in the other alternatives. It's always been an alternative, companies have always been willing to attend training seminars provided by the park. The park even promised them at some point, but never followed through.</p> <p>The park can still limit group size, and number of trips.</p>	1
AL4000	Alternatives: New Alternatives Or Elements	<p>I would like to see a complete ban on all commercial activity in the National Park. I beleive this was a colossal mistake from the very beginning and the idea that people could charge commercial fees using the National Park is just wrong. This activity should never have been allowed and the idea that it was done so many years before anything was paid to the park is just shameful.</p> <p>In order to preserve the integrity of the environment I think bicycle tours should be ended.</p>	10
AL4000	Alternatives: New Alternatives Or Elements	<p>Second, currently and under the new proposals, it seems that the type of tours that get the least respect are the bike tours. I would like to point out that these are the only unique tours available in Hawaii. People geting out of the car and onto a bike (often for the first time in ages it seems) is a beautiful thing. Our whole country has obesity knocking at the door, and the bike tours are a unique opportunity for folks to breathe the Maui mountain air and really experience the climate and scenery changes. I've never participated in a tour, but I don't mind waiting 20 seconds occasionally until the vans pull over and let you pass. I just love seeing people finally getting out, and I always wonder how many of them do the tour, then go back to their hometowns and dust off their old bikes. I expect it has changed many lives!</p> <p>I hope these thoughts are taken into consideration. Mahalo.</p>	12
AL4000	Alternatives: New Alternatives Or Elements	<p>In fact I would propose that anyone under 18 must be accompanied by a parent, guardian, or adult with permission designated by a parent or guardian (such as a youth group leader with a parental permission slip for the child).</p>	24

AL4000	Alternatives: New Alternatives Or Elements	<p>I have one additional suggestion. I would like to see the Park support limited commercial *uphill* bike tours, such as Go Cycling Maui. These are totally different than the downhill tours, because the ride UPHILL is so difficult and arduous that only well-conditioned, experienced riders can do it. There is no danger, as even the fittest professional riders in the world can only maintain a speed of about 10 mph. Currently, cyclists are permitted to ride through the park, and I do training rides to the top myself quite often. Of course I strongly support this. Once I get to the top, there is neither food nor water, and so I must ride with a backpack containing additional clothing, water, and supplies such as rain gear and additional sunglasses. The weather up top is highly variable, even at the peak of summer, so it is impossible to carry all the necessary gear in one's pockets. And then there is the weight penalty of riding with all of those supplies. You're talking about riders who will spend thousands of dollars on the latest equipment to cut a few hundred grams of weight off their bicycle components. But we must ride to the top with 10-15 pounds of water and gear in clunky backpacks.</p> <p>Allowing a commercial operator such as Go Cycling Maui to support uphill riders would allow riders to store their supplies in a van, and therefore we could change into dry clothes and refuel properly at the top. Furthermore, a lot of riders who do the uphill ride really don't want to ride back down, they are completely spent and would rather get into a van at the top and ride down inside the van. Under current Park rules, this is not allowed as a commercial service. It is logistically very difficult to arrange privately, with friends or another cyclist driving the van.</p> <p>The ride up Haleakala is the steepest, longest paved climb in the world. I maintain this ride is so difficult and arduous that the Park will never get into a situation where hundreds of riders and dozens of commercial operators will be attempting it every day. The sheer difficulty limits this ride to the fittest of cyclists, perhaps a dozen a week.</p> <p>The Park Service certainly has enough data on uphill riders via Cycle To The Sun, which has been going for decades without any sort of injury or mishap occurring even once. I would like to see at least one commercial operator licensed to support uphill riders.</p>	27
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AL4000	Alternatives: New Alternatives Or Elements	<p>I even foresee that the only way to enter the Summit would be via an escorted tour.</p> <p>It should be a test driven, certification program, with a 100% pass this test rule, both written and oral (proper enunciation of Hawaiian words).</p> <p>Since the Summit and Kipahulu are so different in Cultural and Natural Resources, a separate test should be given for each area</p> <p>Again, we should be doing this already. How can I help?</p> <p>In reading the draft and listening in on our gatherings/meetings, I believe that having a Concession Permit for both the Summit and Kipahulu would be problematic. Both areas have so many differences in both cultural and natural resources that it would be difficult to educate the land based tours on both to the level that is much needed.</p> <p>I believe having separate permits would be more correct. As an example, a 25 passenger vehicle makes more sense at the summit, these vehicles take up about the same parking area as a single rent a car, yet provide supervision, and education for the 25 people, rather than ten visitor cars. The parking area is close to view planes and points of interest that can be managed by a tour guide or two.</p> <p>The Hana Highway, to the park is narrow and most of the residents don't like the larger vans. (I'd say none like it, but I have not talked to everyone, yet!) We spend more time on the Hana Highway than we do in the park. The time in the National Park is about 10% of the total day. After listening to the residents of Hana, Kipahulu and Keanae we made a commitment to keep our vans at the 12 to 15 passenger size, out of respect for their communities. Having a limited number of concession permits that include both the summit and Kipahulu would lend itself to providing 25 passenger vans verses the 12 to 15 passenger vans, we already hear from the residents, along the Hana Road, how frustrated they are with the larger vans. Again this is a major difference between the Summit and Kipahulu.</p>	28
AL4000	Alternatives: New Alternatives Or Elements	<p>And we are quite sure that the owner of the concession won't offer tours for small groups of eight or ten travelers in any language besides English. In the moment, travelers can book tours in Japanese, Korean, Mandarin, Spanish, French and German. In the future, these people probably will rent a car and there will be more traffic and less parking. Other National Parks like Zion, Grand Canyon or Yosemite try hard to curtail personal vehicles!</p>	29

AL4000	Alternatives: New Alternatives Or Elements	<p>Of the four alternatives, B is stated as preferred by the park administration. This testimony suggests changes and/or comments to alternative B in order to support park staff, access and preservation of this amazing public asset.</p> <p>The parks should partner with commercial service providers as an outside work force and train them as such. They've a vested interest in the park. Commercial guided tours are supervised land tours; rules are recited to guests and followed. There is an opportunity to teach and educate respect for the environment and culture. Usage fees are paid to HNP for the privilege to conduct business in "this" park. These operators watch over and protect the resource while assisting customers and non customers. Obviously a demand exists for the park, especially at sunrise. Unorganized, unsupervised visitors cause an increased conflict, detriment and safety hazard. Commercial operation equates to additional eyes, ears and enforcement. SO Why is the impact to limit and reduce?</p> <p>How are these positive changes? The mix of tours provided should be market driven. If the issue is these larger groups are not adequately supervised, address this with a guide to customer ratio or "group" size.</p> <p>The park last year had less than 1/2 the visitors experienced in 1999. The impact of visitor # is not an issue. Reducing the number of businesses by 79% is outrageous! I understand the need to open the process to be competitive. Set a capacity number and use Alternative D's model of issuing out preferential or right of renewal 19+ CUAs. This would support a healthy economy while creating a competitive process of high quality progressive products. Reduce work load on staff by automated managerial tasks of data collection & CUA processing via a computer system, where by the CUAs enter the information directly.</p> <p>If the demand exceeds the facilities, upgrade the facilities while limiting use. If the natural resource is too fragile, restrict usage to only controlled commercial entities – like was done at Hanauma Bay or with the Colorado River, which crosses over federal, state and county jurisdictions. Appropriate commercial activities reduce impact, enhance experience and provide funding to restore and maintain the resource. Residents & visitors deserve it. Hawaii requires it for future generations to experience it.</p>	34
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AL4000	Alternatives: New Alternatives Or Elements	<p>6.If a concession company fails to meet those criteria they could be disciplined with fines, suspensions or even revocation of their contract. If there are only 4 concessions, a loss of one of those companies would equate to 25% loss of commercial service and visitors. More concessions would lessen the effect when a company is disciplined in such a way.</p> <p>7.Socioeconomic impact will be great if commercial services are reduced from 19 to 4. Many companies would not be able to sustain the changes and may go out of businesses. Other local businesses in the surrounding of the areas of HNP will be effected as less visitors will be using their services. The loss of jobs will also not be as significant with more concessions.</p> <p>8.More commercial Services would result in less rental cars. Less rental cars would result in less congestion on roads and in parking areas.</p> <p>9.Commercial Services can be an asset to Haleakala National Park. Our tour guides currently help manage the National Park areas by informing others not on the tour of rules and guidelines. They have also assisted when needed to managing the parking situation at the summit and also attending to those that need emergency help. Our guides are required to be first responders, and our vehicles required to have a well-supplied first aid kit.</p> <p>10.Competition creates quality services. More concessions results in businesses having to work harder to obtain clients. With only 4 concessions there is little incentive to go above and beyond with services because they have no competition. They are guaranteed a full ride. Increasing concessions brings back the competition which creates opportunities for businesses to be better than ever.</p>	36
AL4000	Alternatives: New Alternatives Or Elements	<p>But out of the 3 available options, a modification of Alternative B could be beneficial to Haleakala National Park, Commercial Services, and all visitors of Maui. We propose that the amount of concessions for this alternative be increased from 4 to 8, 10 or even 12 concessions.</p> <p>The following list is a brief but to the point compilation of reasons why this options is best for all parties.</p> <p>10 reasons for more than 4 road-based tour concessions:</p> <p>1.Diversity of Activities ie: self-guided bike tours, guided bike tours, cheap bus tours, expensive high end tours, ethnic specific tours including the Asian and Hawaiian markets</p> <p>2.Greater Marketing opportunities. Reaching people who would otherwise not visit Haleakala National Park if not accompanied by a specific commercial service.</p> <p>3.Tour material can be mandated by Haleakala National Park. All Concessions will attend classes to instruct them on proper tour material involving aspects about the culture and natural resources</p> <p>4.More commercial services mean less independents. Independent travelers have their right to visit, but are more likely to cause damage to the natural resources in HNP due to the lack of information that they obtain. The best option for preserving the park resources is if visitors are with commercial services who can properly and thoroughly relay important information.</p> <p>5.No matter the amount of concessions, they should all be held to the same standard and have to meet set criteria. They should be instructed in the proper way by attending classes organized by Haleakala National Park</p>	36

AL4000	Alternatives: New Alternatives Or Elements	<p>We understand the Park Services concern and the need to control the number of visitors and vehicles, and their impact on the eco-system and the infrastructure. There is an obvious need to limit, on a daily basis, the number of people and vehicles in the Park at any time, especially at Sunrise, when demand is at its peak. What we PROPOSE is putting a system in place that allows ACCESS to the Crater to All certified CUA Holders by an Advance Reservation System. This would allow Occasional Users, like us, ACCESS when the need arises. We can then All SHARE the precious resource that is Haleakala National Park. We would be open to the volume user's needs, as on 'Ship Day' when their demand is high, that they receive some preference. That is sharing the Resource. By an Advance Reservation System the PARK SERVICE could Regulate and Control the number of vehicles allowed in the Park at any given time. With REASONABLE time frames for Reserving a spot on the mountain in Advance, this, to us, would be a Fair and Equitable Resolution to the issues of Over-crowding and Over-use of the Infra-structure and the Impact on the Environment & Eco-system.</p> <p>Proposed Solution: Utilizing an Advance Reservation System to co-ordinate ACCESS for these Cultural Events would allow the Cultural entity to utilize the certified CUA Holder of their choice. An Advance Reservation System monitoring daily use and Cultural Access seems a simple enough SOLUTION. You meet the requirements to Regulate the number of people and vehicles, allow for Cultural Access to Native Hawaiian groups and address the issues of Safety within the Park and the impact on the ecology and infrastructure.</p> <p>We understand that these proposed alternatives will require forethought before implementation. Already having a system in-place to reserve Cabins in the Crater, should be of some assistance when considering this alternative.</p> <p>Please accept this in the spirit it is intended, the spirit of compromise and resolution. I know we may be late to the table with this suggestion, if it has not already been presented. However, we feel an Advance Reservation System should receive very serious consideration as a Solution to Regulating over-use & ecological impact.</p> <p>Malama pono,</p> <p>Kimo Kay Group Sales & Services Akina Aloha Tours P.O. Box 933 Kihei, HI 96753</p>	40
AL4000	Alternatives: New Alternatives Or Elements	<p>Secondly, we support to stop operating a bus and a minibus in the park due to greenhouse gas emissions and carbon footprint. However, as we believe that we all should have equal rights, considering the balance with bus companies, we suggest that operating up to two vans can be accepted per day. Here we have an inquiry: the alternative D says, "Group size would be limited to a maximum of 12 people.", but we think we can be allowed to carry 15 people in a van including a driver and a guide, since a regular van can accommodate up to 15 people.</p>	41
AL4000	Alternatives: New Alternatives Or Elements	<p>c) It would seem an alternative whereby those "road Based" tours that attribute only 23% or less of their revenues to the Park could compete among themselves for a "to be determined" number of concession contracts and allow the "Road Based" with bicycle option tours to compete among themselves for a "to be determined" number of concession contracts. This option would allow a more even playing field and allow more businesses to remain alive (providing jobs and revenue to the Park, County and State).</p>	43

AL4000	Alternatives: New Alternatives Or Elements	<p>I am writing in response to the Commercial Services Plan for Haleakala National Park. I find That Alternative B is the preferred alternative. I would recommend maximizing the number of days when Commercial Services in the Park would be prohibited, It is important to let the aina breathe and refresh itself, and to let the local community and the Native Hawaiians use the Park for family, for gathering, and ceremonies without being overwhelmed by the number of visitors. I would also strongly recommend that the wording in regards to Road-based Tours be changed to say " The number and types of road-based tours could be limited at Kipahulu at the discretion of the Superintendent." Please remember that every rental car as well as the tour buses and others are all commercial services. Daily the Park and the narrow, winding road, the only one we have, are both overwhelmed by visitors and their vehicles. The Park has an opportunity to make the Hana Highway safer, less crowded, and create less pollution and trash by encouraging the use of smaller vans for tours. They are far more appropriate for the road. In our discussions with Park personal and the tour services operators at the August 17th meeting, there was a good consensus that small groups lead by knowledgeable drivers and guides was the safest and most environmentally sound way to experience the Kipahulu District. The Park, by giving preference in parking and perhaps fees to smaller tour vans over singular rental car use as well as the over-sized tour buses, would strongly help eliminate congestion and pollution and enhance the visitor experience. And improve relationships with the community of Kipahulu and the Hana side. Which could use some improving.</p>	45
AL4000	Alternatives: New Alternatives Or Elements	<p>We do not agree with limiting the number of commercial use providers for road-based tours. That action would discriminate against smaller operators like us that provide specialized services to specific markets that bigger companies do not address, as they don't have the human resources that we have and they will not do it either because for them it would not be cost-effective. This applies to all international markets operators. Our clients, as so many others from different countries, don't speak English and therefore cannot understand and appreciate the value of the park unless the tour is provided in their own language. A written flyer is not effective, as most people on vacation, even English speakers are not likely to read it.</p> <p>Maui is turning every year more and more into an international destination. The National Park Service US Department of Interior promotes all the parks at the most important international travel trade shows. Operators from all over the world emphasize visiting these parks to their clients. There is even a world-wide campaign launched this year (called Land of Dreams) as a result of the US Travel Promotion Act, promoted by the president and approved by the federal government, that emphasizes the beauty and the quality of all the US National Parks. We believe that by limiting the permits to 4 or less companies the international visitors are going to be left behind.</p> <p>The international tourists are the ones that most need guided tours as they don't speak the language and cannot follow written directions that are already posted in the park. Currently, most of them as they don't have the operator who will take them, rent their own car and go on their own, thus possibly creating more harm than by going on a educating guided tour in their own language.</p> <p>We are also wondering what kind of criteria will be used to choose that limited number of operators.</p> <p>Our suggestion is to not limit the number of road-based permittees but to establish a system, where everybody gets a fair chance to provide the service to their clients. For sunrise there can be regulation as for number of vehicles per company and/or alternate days per company. There can also be a distinction between the permit for sunrise and day tours and the permit for day tours only.</p>	47

		<p>Dear Sirs,</p> <p>After reading the draft of the Commercial Services Plan for Haleakala National Park we would like to send our comments from the point of view of a tour operator specialized in a specific niche market. As a responsible commercial entity with 13 years in existence serving Spanish, Portuguese and Italian speaking visitors we agree with the issues addressed by the park administration in this document. However, we believe that none of the alternatives given are a real solution for these issues considering the importance of Haleakala as the major attraction in Maui.</p> <p>We do agree that there are activities provided by commercial operators that affect the environment at the National park. Some activities have more impact on safety issues to everybody using the park, some on environmental issues. We would like to address the issues related to the road-based tours operators. We make this differentiation between road-based tours and other activities because we believe that this type of activity is the most safe, most respectful of the culture and the environment and most easily regulated in order to achieve the goals of the park administration.</p> <p>From this point of view we don't agree with the assessment that the number of road-based tours has increased as much as in other activities. In any case 15-30% of park visitors coming with the commercial operators does not seem to be the major contributor to the problems presented. On the contrary, we feel that the commercial operators provide a unique opportunity to educate the visitors according to your plan and the goals you want to accomplish. We think that individual visitors need be regulated too.</p> <p>At sunrise time the park is overcrowded. At any other time there is no parking issues. Therefore the sunrise time is the one that mostly has to be regulated, not only for commercial tours but also for the individual visitors. If the parking has a certain capacity, the number of individual vehicles allowed should be according to that capacity, including the visitors center and the Red Hill parking. The same criteria should apply for Kipahulu. The road-based operators actually help alleviate the parking problem since they are bringing larger amount of people coming in one vehicle, rather than for example in 7 or 15 individual cars. This reduces not only the parking problem but also environmental impact.</p>	
AL4000	Alternatives: New Alternatives Or Elements		47
AL4000	Alternatives: New Alternatives Or Elements	<p>It should be noted that some of the Hana Road is very Narrow. Limiting tour vehicles less than 13500 GVW would minimize the impact to those who live and travel the Hana Road on a regular Basis.</p>	48

AL4000	Alternatives: New Alternatives Or Elements	<p>How does a CUA provider ensure the highest quality? The following is a list of qualities that works to accomplish this goal of the Commercial Services Plan for a high quality experience:</p> <p>Use and maintain the most comfortable and upscale Limo-Van fleet Limit the number of passengers to 8 per Limo-Van Highly train and educate tour guides about all aspects of Haleakala National Park - Maui's number 1 tourist destination.</p> <p>Do our visitors expect a High Quality Experience? Yes, Maui visitors first of all are unique and different to most National Park Visitors- a point that was not addressed in the draft commercial services plan. According to HVB, Maui's entertains an international visitor roster, as well as many upscale US mainland visitors. Visitors have to purchase an expensive plane ticket even to fly to Maui and for many; it is a trip of a lifetime. This segment of the visitor population should not be disappointed or forgotten and should be afforded their desires to visit our National Park and have a high quality experience.</p> <p>Other visitors that have special needs would utilize the services of a specialized CUA provider. The elderly, hearing impaired, blind, obese and mentally challenged would be better served in a comfortable calming atmosphere of an 8 passenger Limo-Van. High profile guests enjoy the security of a smaller upscale Limo-Van.</p> <p>Also, most important are the children that visit Haleakala National Park deserve the safest experience. Our Limo-Van fleet offers the safest car seats and boosters (at no extra cost) for all children required to use them. All our captain chairs have safety belts and can secure each child car seat. Children are less likely to experience motion sickness in a smaller and less crowded vehicle.</p> <p>Each Limo-Van is quieter than a 25 or greater passenger mini-buses that would likely be used in a commercial service contract. The soundscape would be less impacted by our smaller engine Limo-Vans.</p> <p>To sum up: Alternative B. should also include the opportunity for a company to be issued a CUA to provide the list of services mentioned above.</p>	52
AL4000	Alternatives: New Alternatives Or Elements	<p>The client numbers that we are currently doing represent the absolute best effort that our budget allows. To increase our usage would require prohibitive investment. Our physical capacity, including available pasture, put limitations on our livestock growth potential. In conclusion, we believe that the current usage of the park resources by the horseback tours is at an optimal level. We therefore request that you consider a change under the NPS Preferred Alternative to allow for one CUA to be issued in the Kipahulu District, allowing up to 12 horses per group and to run two trips per day, six days per week, except for 3 to 5 days per year. No access to the summit will be allowed.</p> <p>Thank you for your considerations, Me ka ha'a ha'a Ed Lincoln President Kipahulu Trading Co., Inc</p>	57

AL4000	Alternatives: New Alternatives Or Elements	<p>In conclusion, Superintendent, I am asking for your consideration to use the language in Alternative D, under the second bullet point for horses that read "The commercial services provider would be allowed up to 12 horses per group and run an unlimited number of trips" and substitute this for the second bullet point in Alternative B. In all things I get involved with, I always remind myself to use my energy to become a part of the solution, not the problem. This change I am proposing, I believe, will become part of a workable solution.</p> <p>Me ke aloha pumehana, Lori Sablas</p>	70
AL4000	Alternatives: New Alternatives Or Elements	<p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>I think the activities in HALE-NPS do not adequately address activities that continue, on commence, with the onset of sunset (darkness). I know of actions that compromise the natural resources after dark due to activities of commercial tours and night time visitors to HALE-NPS. I encourage you to review and curtail "astronomy tours" and night-time activities that are harmful. Perhaps limit astronomy tours to levels that occurred a decade ago (2000) to reduce impacts. Also have present more/ adequate law enforcement officers after sunset and until the night-time activities end. "Page 59 top right" calls for too few LE. I'd suggest 1 or even 2 FTE-LE for night-time activities to keep visitors after dark on trails, off sensitive plant and animal resources. The HALE-NPS must provide nocturnal protection of resource and night-time managamenet of HALE visitors both commercial and non-commercial.</p>	82
AL4000	Alternatives: New Alternatives Or Elements	<p>doing morelocal outreach and guided tours rather than a free for all up there.</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>Allow motor coach tours because they cut down on cars entering the park 1 bus is equal to 30+ cars full of people. Cut down on cars going up. Motor coach also does guided tours and can control their groups. Bicycle tours don't control their people and individual cars are destructive and uncontrolled.</p>	84
AL4000	Alternatives: New Alternatives Or Elements	<p>increase no commerical days to 5+ per year</p> <p>-Keeping the visibility to non-commercial users of CUA's minimal= smaller and fewer tour groups</p> <p>-Allowing for CUAs to have the oppty. to be successful w/ extended contract periods but require above annual review.</p>	86

AL4000	Alternatives: New Alternatives Or Elements	<p>A mix of 4 concessions and one or two CUA companies would provide the best mix of vehicles - mini buses and smaller comfortable vans. This mix is more flexible for the park management as well could more profitable for park revenue. The overlooking of this niche market which provides the opportunity to serve more of the public would be not the best way to provide a better visitor experience.</p> <p>The Commercial Services Plan, May 2012, does not state the actual size of the Mini-Bus, length and width, and the number of maximum passenger seats. This should be addressed in the plan for the protection of the Park. The mini-bus should be limited to a maximum of 25 passenger seats. This would allow 200 visitors for sunrise in Mini-buses and room for smaller exclusive special niche marketing visitor groups utilizing appropriate smaller vans.</p> <p>Also, for the National Park protection, the concessionaires should be United States owned and operated.</p> <p>In summary, we feel that it would be beneficial to the National Park to combine the advantages of Alternative B with Alternative D to control commercial use and offer the best financial possibilities to the National Park. Alternative B offers structure with 4 concession contracts and Alternative D offers the variety of CUAs with caps. Combining these two alternatives would make room to offer a niche market that would increase park protection, revenue and enhance visitor experience.</p> <p>We would like to state that the combination of Alternative B and Alternative D would best suite the National Park for revenue, protection and visitor enjoyment.</p> <p>If you have any questions for us please feel free to call 808-249-2920 or email dremaui@live.com.</p> <p>King regards, Dave and Kathy Campbell, Temptation Tours</p>	91
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AL4000	Alternatives: New Alternatives Or Elements	<p>Comments on the Commercial Services Plan that would be beneficial to Haleakala National Park financially and would provide a better visitor experience for of all visitors.</p> <p>The current draft of the Commercial Services Plan, May 2012, does not include, in any of the alternatives A, B, C or D, a niche marketing proposal that would address a variety of visitors that might not visit the park if this niche was not offered to them . The Web definitions of niche is as follows:</p> <p>'A niche market is the subset of the market on which a specific product is focusing; there fore the market niche defines the specific product features aimed at satisfying specific market needs, as well as the price range, production quality and the demographics that is intended to impact. "</p> <p>Examples of this type of visitor would be as follows: upscale private families, private visitors that require security, government officials, non-English speaking visitors that require translators, the elderly, hearing impaired, blind, obese and mentally or emotionally challenged. The National Park would be better served if a specialized company with small passenger vans, could service these guests to provide a high quality visitor experience and produce more revenue for the National Park.</p> <p>Alternative B could be amended or combined with Alternative D to include this niche. The 4 concession contracts proposed in this alternative does not provide the inclusion of these niche groups. A concessionaire would most likely use a 25 passenger mini-buses, and be responsible for protecting 25 passengers in the National Park. As "one size does not fit all" expression indicates, this type of concessionaire (using a 25 passenger minibuses) would not be able to address the needs of this niche marketing for the National Park. The mini-buses would not insure privacy for the smaller groups or the comfort that they may require. The mini-bus "look" can not be changed, even with limiting passenger counts, therefore would not be able to fill this niche requirement that would bring financial reward to the National Park. Guides utilizing the 25 passenger mini-bus would not be able to offer the personalized service and guidance that this niche would require.</p>	91
AL4000	Alternatives: New Alternatives Or Elements	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan?</p> <p>In our opinion, Alternative C would not hurt the economy as long as more than 3 concession contracts are awarded. I think there should be at least 10 concession contracts. This way, the clients that are on this tour can be breifed [sic] where they are allowed to go, to minimize the trampling, compaction and erosion of soil. The clients will have breifing [sic] on the environment of Haleakala as well as how it correlates with the Hawaiian Culture. This will also give access to foreign costumers [sic] that do not drive a way to enjoy the biggest highlight of Maui.</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>Alternative C. As for the astronomy groups, I do not see why only up to six people would be allowed. As far as staffing I do not see any difference whether there are 6 clients or 12. I think one ranger with the assistance [sic] of our guide should be able to handle 12 people.</p>	97

AL4000	Alternatives: New Alternatives Or Elements	The Hawaiian petrel may be the species most impacted by commercial services as outlined in the Draft EA. Detected petrel mortality in 2012 was greater than any other year over the last 25 years. More significantly, the seven detected deaths over the past three years (2010-2012) are more than the six detected deaths over the prior 13 years (1997-2009). There was a significant spike in the number of astronomy tours in 2001, and since that time, there have been 13 detected Hawaiian petrel deaths. The Draft EA states that commercial services account for about 20 percent of night traffic, including as high as 70 percent of Haleakala summit visitors during sunrise. We recommend NPS consider further actions to reduce the likelihood of vehicles colliding with listed birds, especially reducing or slowing vehicles over the approximately 2-mile stretch of road through the Hawaiian petrel colony. Another consideration may be to reduce the number of astronomy tours to the level allowed in 2000, especially during the nine months of the year that Hawaiian petrels are in the colony. Other options for that 2-mile stretch may be posting Hawaiian petrel colony signs, lowering the speed limit at night, prohibiting passing of other vehicles, and using automated cameras or elevated law enforcement levels to catch violators. Lower speeds with greater awareness may reduce the rate of vehicular collisions with Hawaiian petrel, whereas less traffic in general may decrease the possibility.	98
AL4000	Alternatives: New Alternatives Or Elements	So I support Alt C, but no need to reduce the # of horses in Kipahulu. This makes sense to me.	99
AL4000	Alternatives: New Alternatives Or Elements	d. Commercial bicycle tours are currently prohibited within Park boundaries, but bike tour vehicles and participants commonly visit the summit prior to the bike tour. To reduce noise and congestion, the Department recommends that tour operators do not conduct bicycle tour orientations or distribute bicycle helmets and other equipment at the summit. To further reduce congestion, bicycle trailers could be parked at the Park entrance.	100
AL4000	Alternatives: New Alternatives Or Elements	2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they? i think that there should be a couple of each type of company allowed to have access to the parks.	103

AL4000	Alternatives: New Alternatives Or Elements	<p>7. Commercial tours exist to serve the public and the park. All members of tour groups are members of the public who have hired a knowledgeable guide to assist, educate and guide them through the park. By restricting tours, you are primarily restricting the assistance you receive from tour guides and limiting the regulation you have over the public, since you have direct jurisdiction over tours in a way that you do not have over the public.</p> <p>8. Our guides know the identity of the plants along the trails. They have been taught ethno-botany. They consider any native plants especially valuable, even those that are not threatened or endangered.</p> <p>9. Our guides know how to recognize threatening weather, potential flooding and other safety concerns and deal with such conditions appropriately..</p> <p>10. Our guides not only inform our own clients, but anyone who follows them, about the environment and the park policies. When someone needs help or is injured along the trail, it does not make any difference if that person is our client or not, our guides render assistance in whatever way is needed. We have even carried out injured members of the public several times.</p> <p>For all of these reasons and more it should be clear that commercial hiking tours that have well- trained guides should not be limited and should be valued above the freedoms extended to the public. If there are to be restrictions, they should be applied to the untrained and inexperienced public and not to the well-trained and environmentally-committed tours.</p> <p>If you are concerned about the possibility of commercial hiking tour operators and guides who are not well-trained, as may be the case with companies from the mainland and other countries, perhaps you could consider different levels of permits, some of which could be more restricted than others. Education and training are of primary importance. Long term, the training requirements that you propose appear excellent and should provide a good level of guides' environmental awareness.</p>	105
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AL4000	Alternatives: New Alternatives Or Elements	<p>because of the following:</p> <ol style="list-style-type: none"> 1. Although there is only one local CUA holder offering hiking tours in the park, many of the assertions below should apply to any hiking tours with well-trained guides in the park. 2. Unlike the summit area, the trails at Oheo are often crowded with hundreds of public hikers who often do not know the park regulations and have only our guides to inform them. 3. Although we do not usually have enough demand to operate more than one tour to Kipahulu per day, there are times, especially in the summer and around Christmas, when we have enough requests to run two and very occasionally three tours in one day. 4. You may know how well-trained our guides are, and assuming that you will be offering and requiring adequate training of guides in the future, any restrictions on the numbers of hikers should properly be applied to the untrained public hikers and not to guided tours. 5. By transporting groups of hikers in one tour, we minimize the number of motor vehicles in the park. 6. One of the negative effects of hiking tours listed in your CUA draft is the trampling of vegetation. Since we stay on trails that are maintained to be able to handle foot traffic, I do not comprehend how we could trample anything that should not be walked on. Contrast this to members of the public, who walk wherever they please. The trails in Kipahulu are often very muddy. Our clients know that they need to be prepared to walk in mud that can be very wet and slippery. We do not make the trails wider in areas that are sometimes swampy. Our guides direct our clients to follow the guide on the primary trail bed, because by the end of the hike everyone's shoes will be soaked in mud anyway. The best way to thoroughly enjoy this hike is to release our inhibitions and immerse ourselves in whatever nature presents to us, while following all the park guidelines and regulations, which are for the benefit of the environment and the safety of everyone. 	105
AL4000	Alternatives: New Alternatives Or Elements	<ol style="list-style-type: none"> 2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? Is so, what are they? <ul style="list-style-type: none"> -1. Include ecotours & photography tours for CUA! - 2. Smaller tours visiting different locations in the park will reduce congestion at summit. - 3. All vehicles should be hybrid, electric, bio-diesel to reduce carbon footprint of commercial use in park. - 4. Alternate days of use for larger tour companies - 5. offer voluntourism [sic] projects to allow public to work on preservation of park. - 2. All CUA providers should be first aid/CPR certified to ensure safety and care of visitors. 	106

AL4000	Alternatives: New Alternatives Or Elements	<p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>I would definitely like to see the inclusion of companies who use ecologically friendly technologies such as hybrid electric vehicles. This will reduce noise and emissions. I would also like to see the inclusion of tours that offer an educational component about the geology and flora, local culture and history, and preservation of our National Park.</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>If there are to be a limited number of concessions given, I certain [sic] hope there will be diversity so that Park visitors will have options outside of the large bus services. I believe the inclusion of companies that offer a better educational component and use smaller ecofriendly vehicles offer Park Guests a richer experience.</p>	107
AL4000	Alternatives: New Alternatives Or Elements	<p>We urge maximizing the number of days when Commercial Services in the Park would be prohibited, to let the aina refresh itself, and to let the local community and the Native Hawaiians use the Park for gathering and ceremonies without being overwhelmed by the number of visitors.</p> <p>We propose the Park help make the Highway safer, less crowded, and create less pollution and trash by encouraging the use of smaller vans for tours. In our discussions with Park personnel and the tour services operators at the August 17th meeting, there was a good consensus that small groups lead by knowledgeable drivers and guides were the safest and most environmentally sound way to experience the Kipahulu District. The Park, by giving preference in parking and/or fees to smaller tour vans over singular rental car use as well as the over-sized tour buses, would work to this end.</p> <p>We suggest a change to this sentence in Alternative B: "All commercial guides would be required to participate in training and be certified to operate in the park." We ask the Park to include native Hawaiian cultural training in that certification process.</p> <p>Therefore, we recommend that Alternative B for the Commercial Services Plan be accepted with the additions given above,</p> <p>Mahalo, The Kipahulu Community Association Board of Directors on behalf of the Kipahulu Association General Assembly of September 9th, 2012 Tweetie Lind, KCA President Seth Raabe, Vice President Steph Reeve, board member Aloha, Seth</p>	108
AL4000	Alternatives: New Alternatives Or Elements	<p>The mix and quantity of tours should be driven by the market. If there are fewer tours available, then visitors will certainly find other ways to enjoy the park. The benefit of organized tours include the fact that they provide valuable education in regard to the "dos" and "don't's" of enjoying the park, and history lessons about our kuleana to respect and care for this very precious area. Eliminating the amount of organized tours will increased traffic of individual vehicles with greater numbers of uneducated visitors traipsing through the park.</p>	109

AL4000	Alternatives: New Alternatives Or Elements	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plans?</p> <p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>For the astronomy tours, I do not understand the reason behind limiting the number of clients to 12 for each CUA when sunrise is permitted to have 2 mini buses. I have found that the parking lot at the visitor center is basically empty during sunset in comparison to the sunrise, and the number of clients is probably just 20% in comparison. If there is a need to charge more to cover staff cost, I see no problem with that.</p>	113
AL5000	Alternatives: General	I believe a plan of Action (Plan B) to be best for the environment of the park.	3
AL5000	Alternatives: General	<p>Regarding Page 4</p> <p>"the summit (and crater) and Kīpahulu. The resulting crowding and congestion have contributed to adverse impacts to visitor experience and to the park's natural and cultural resources. Soil degradation, excessive erosion, trampling of vegetation, and disturbance of endangered species, such as the Haleakalā silversword and Hawaiian petrel, have occurred in localized areas. Crowding and inappropriate behavior have contributed to a loss of sense of place, which is often the initial reason visitors come to the park; interference with traditional cultural uses; and increased negative perceptions of the park by Native Hawaiians. Commercial tours are believed to have contributed to these impacts in the past. A plan is needed to provide direction on addressing adverse effects that may be occurring due to commercial services"</p> <p>Comment: We..... Commercial users can, and should be part of the solution, by educating our passengers. We do this now, on our tours, but feel we should be doing more to educate our passengers as a commercial industry using HNP.</p> <p>Suggest educating (cultural resources and cultural practices and meanings)our guides and business owners, Managers be a requirement for a CUA beyond with what the park requires now</p>	5
AL5000	Alternatives: General	Aloha and thank you for addressing such an important issue on behalf of our beautiful island community. I am in favor of restricting all commercial activities within the unique boundaries of the Haleakala National Park.	6
AL5000	Alternatives: General	Aloha, I am a retired Hawaii Science educator and naturalist. I have been hiking Haleakala Crater for 30 years, logging hundreds of trips over the years. The move to limit/control the commercial activities at Haleakala Nat.Park is wise and timely. I generally support Plan B.	9
AL5000	Alternatives: General	Option 'D' is by far the preferable choice. The Park Service preference is typical of the elitist and troubling attitude the NPS has increasingly had toward the general public. Whenever the NPS believes it can get away with restricting the general public access to the Parks, they inevitably do it. I have seen this at the two other Parks I frequently visit (Grand Canyon and Yosemite). Although I live in Arizona, this is important to me because I visit Maui for at least two weeks every year, and often visit this park. I do not find the commercial tours to be in any way a major nuisance. They provide access to the Park that otherwise would not be available to less adventurous tourists. Not only should these commercial tours not be restricted, they should be expanded.	11
AL5000	Alternatives: General	I support the Park's Plan B and am encouraged that you are open to having days when all people are welcome to come and participate in their cultural practices. And PLEASE, keep the bike tours out of the park. Mahalo	17

AL5000	Alternatives: General	<p>My comments today will be on how this plan affects ME personally. Being that Haleakala National Park has made it clear that their preferred plan would be Alternative B, I will highlight how that affects me and my family, and why that alternative B (or C) is NOT the best choice for Haleakala National Park, Maui, it's visitors and it's residents.</p> <p>I feel our company to be strong, reliable, and essential to the success of Haleakala National Park at the summit. And although I feel that Haleakala Bike Company is a strong candidate for one of the awarded "concessions", doing nothing but providing great informative tours, being respectful to the park and it's resources, and following every rule and guideline that HNP provides to us, I still can't help but to feel saddened if the park went the preferred Alternative B route. This I say not only because it would affect ME personally, but because my story isn't the only one. I'm not the only one who supports his family on the income provided by a tour that visits Haleakala National Park. I'm not the only one that would lose provided insurance if my employer went out of business. I'm not the only one that would struggle to find employment in the well known struggling job market. I'm not the only one who will struggle to pay bills and make ends meet. I'm not the only one who's life could potentially be flipped and turned up side down, having to start from scratch after the company disintegrates. Haleakala National Park is an essential part to this and many companies existence. And I will argue that sompanies like ours is essential to HNP's success. You take away the park, you put myself and hundreds of others without a job. From the companies themselves, to restaurants, shops, hotels, agencies, the list goes on. Many, many people will be affected, that is a guarantee.</p> <p>This is my PERSONAL statement. But it's not so personal when it affects hundreds of others in the same way. Please consider the detrimental consequences that some of these alternatives will have on the local families of Maui.</p> <p>Mahalo Lewis Upfold</p>	18
AL5000	Alternatives: General	<p>I believe Haleakala National Park should remain open as it is today to all visitors who wish to visit. The purpose of the national park system is to make national parks available to visitors so that they can enjoy and be inspired by the great outdoors. We citizens are the tax payers who bought this property and who own it and it should be kept open to all who wish to visit it. The big buses that take thousands of tourists to the top so they can enjoy it should be allowed to continue. Tourism is fundamental to the survival of the economy here in Maui. People come from around the world to see Haleakala National Park and to turn them away because of some new quota system would be tragic.</p> <p>Only if there are serious safety issues should restrictions be applied. So I agree with the Park's decision a few years ago to ban downhill biking because visitors were being killed by bad accidents. But, except for safety issues, the park should be open to all visitors. Maybe, someday, if Haleakala National Park became as crowed as Yosemite National Park, then maybe some form of control might be necessary, but we are a long way from that at this time.</p> <p>It is further my understanding that the original act of Congress creating the national park system specifically stated that the parks should be open to all citizens. So please don't start banning the big buses and the number of people who can visit Haleakala National Park.</p> <p>Thank you.</p> <p>Bob Babson</p>	21

AL5000	Alternatives: General	<p>It has come to my attention that the Board for the CUA is considering limiting the number of trail rides for Maui Stables. As a neighbor, I would like to go on record as being opposed to the idea of limiting or restricting the use of public land and our natural resources to any individual.</p> <p>Maui Stables provides safe passage for people into Park areas that these people could otherwise never be able to access on foot. These people include young, old, and handicapped individuals who have no other way than horseback to explore Oheo Falls and experience the mountain beauty of the park. Yes, I said handicapped because there are a lot of overweight folks who need a horse to explore the natural resources of the Park. Maui Stables have purchased heavy duty draft horses to accommodate exactly this type of individual. Maui Stables have purchased horses specifically designed for children and the elderly, and I don't think it is right to discriminate and deny access to areas of the park because of a persons age of size.</p>	23
AL5000	Alternatives: General	<p>Sensible precautions as outlined in the bike tour provisions of Alternative D are fine.</p> <p>The Bike ride down Haleakala is unique among the National Parks and as such eliminating this activity should be done only under the most extreme circumstances. The current conditions do not warrant this action.</p> <p>My ride is one I will remember all my life. It saddens me to think other may not share this experience in the future.</p>	24
AL5000	Alternatives: General	<p>I am a homeowner in Kula and holder of a USCF Cat 4 bicycle racing license. I particularly liked the proposed "tour free days" idea, and I also strongly support the permanent ban on downhill bike tours.</p>	27
AL5000	Alternatives: General	<p>I am impressed with your draft and understand your position. I do agree with the direction, purpose, and intent of this draft and support Plan B, for the most part. Not that I have a vote.</p> <p>I do believe that the Current CUA's are an asset to the Summit area of the National Park, I also believe that with a little more direction all of the CUA's would be willing to help HNP keep the unescorted visitor off the wrong path (so to speak).</p> <p>If the employees could be trained properly (many are now) and there were some way to be identified by the unescorted visitor as one who has knowledge of the NPS, it would be even more helpful. A few have suggested special identifying vests or arm bands that say something like "ASK ME". This would be much easier for the Summit CUA's or Concession Holders to be of greater assistance.</p> <p>I also support a training program for all within the CUA's (concessions) business, I don't think we should wait until this draft and policies are implemented. I believe we should do that now. I believe the owners and managers should be the first to go. Point me in the correct direction and I will begin.</p> <p>A lesson plan should be put together by Cultural Advisors and National Park Staff; this should be funded by the Every CUA holder and Future Concession Applicants. I would be willing to fund the Cultural Advisors time.</p>	28

AL5000	Alternatives: General	<p>Personally, we strongly believe Alternative A with maybe some modifications is the best solution for everyone. Maybe HNP can combine concessions for motor coaches and CUAs for vans. If HNP wants to save money, please grant CUA for two years instead of one. This would most certainly also being appreciated by the CUA holders.</p> <p>Sincerely,</p> <p>Horst Ihle</p> <p>Horst Ihle Myna Tours, Inc. Ph. (808) 264-3239 308 Kai Malu Drive, Kihei, HI 96753 E-mail: horstihle@yahoo.com</p>	29
AL5000	Alternatives: General	I support the NPS preferred alternative in the draft commercial services plan as a nice balance between the public enjoyment of the park, the use of the resource, and the support of commercial revenue and services to the park.	31
AL5000	Alternatives: General	Of the four choices I prefer alternative C. I would like plan C even better if it were to include one idea that is included in alternative B which is to prohibit commercial tours for several days per year, perhaps even once or twice a week. I believe it is important to respect the aina and also to respect the wishes of the Native Hawaiians.	32
AL5000	Alternatives: General	<p>After reading your proposed alternatives I have to say that I most prefer Alternative #1, NO CHANGE ACTION. The reason for this is that visiting the summit of Haleakala is the MOST POPULAR visitor experience on Maui.....</p> <p>Visitors from around the world come to see our wonderful island which was created by a volcano. How they arrive at the summit, and what they do once they are there varies widely depending on the social and cultural background of the visitor. The many options that are offered are there because there is demand from the public for the experience. It is a fact that on the island of Maui tourism is the most important industry that we have..... I understand that Alternative #1, NO ACTION would require more NPS employees and more expenses for the park. It seems that raising the fees to the various activity vendors to cover for the expenses that allowing them to do business safely is fair both to the Park and to the vendors. Of course they should have to pay for the personnel who have to deal with the impacts of their visits. The vendors are making very good money by providing services that the visitors want to experience, now it is the challenge of the Park to keep the park clean, safe and accessible for the visiting public, who should be paying for these services via the fees they pay their tour guides and drivers.</p> <p>Thank-you for considering my input.</p>	33

AL5000	Alternatives: General	<p>Alternative B intended impacts are stated as:</p> <ul style="list-style-type: none"> - Eliminates growth of commercial services - Reduces # of commercial visitors - Limit # commercial service providers, Trips/day & parking stalls - Require Cultural training for all staff <p>The specific actions are:</p> <ul style="list-style-type: none"> - Prohibit commercial tours 3 -5 days per year - 4 Concession will replace the 19 CUAs (only open to road based tours) - Limit summit sunrise tours to road-based tours & parking to the visitor center - Reduce the # of parking stalls for road based tours - Reduce # of Kipahulu Horseback riding tours - Limit the # trips/day for hiking, horseback & astronomy tours - Eliminate motor coaches in the park at all times - Required Cultural Training Course & Certification for all Guides <p>Requiring cultural courses for all guides, this is excellent.</p> <p>Limiting commercial visitors doesn't increase the protection & preservation of this national resource.</p>	34
AL5000	Alternatives: General	<p>After reviewing the alternative future plans for Haleakala, Plan C appeals to me the most - fewer bicycles and fewer tours - I strongly feel we should listen to the Native Hawaiians advice on the proper use of this very spiritual area and not base the future of Haleakala on financial concerns - Maui can survive without major income from Haleakala</p> <p>Thank You Suellen Barton</p>	35
AL5000	Alternatives: General	<p>We have written up numerous response drafts to submit to Haleakala National Park, but decided to simplify and focus on one aspect. We've decided to focus on the park preferred Alternative B. As is this alternative falls short of a desirable outcome.</p>	36
AL5000	Alternatives: General	<p>Thank you for preparing the Draft Haleakala National Park Commercial Services Plan.</p> <p>The Friends of Haleakala National Park supports the NPS preferred alternative, that is Alternative B</p> <p>Sincerely, Matt Wordeman, President, Friends of Haleakala National Park</p>	39

AL5000	Alternatives: General	<p>To Whom It May Concern,</p> <p>My name is Jay Hun Lee; I am President of Kaze Enterprises, LLC. that provides our customers from Japan with an astronomy tour in the Haleakala National Park as Haleakala Sunset & Stargazing. We carefully considered your analysis and the four alternatives, and we respectfully support the Alternative D to some extent, but there are some points of view we ask you to reconsider before you make a final decision, so we urge the importance and value of commercial services in the park as follows:</p> <p>Finally, we would like to make sure that you would not accept any new CUA member, please, since you try to limit current commercial services.</p> <p>If we can be of any further assistance, please let us know.</p> <p>Thank you so much for your time and consideration.</p> <p>Best regards,</p>	41
AL5000	Alternatives: General	<p>1. We like alternative B because it focuses on the early morning sunrise. It does not punish our company, Merry China Travel, which only offers late morning or early afternoon tours.</p> <p>2. Your alternative is well plan.</p>	42
AL5000	Alternatives: General	Alternatives C and D are too restrictive - therefore, all comments are in response to Alternative B.	43
AL5000	Alternatives: General	It can be a good thing to set aside a few days a year for Native Hawaiians to visit.	44
AL5000	Alternatives: General	<p>As ever, I wish to remind the Park Service of the uniqueness of Haleakala and Kipahulu, and to remember that a sustainable and environmentally sound approach to a Commercial Services Plan would NOT allow uncontrolled growth of commercial services and all its attendant misuses of the aina. Therefore, with the changes to wording given above, I strongly recommend that Alternative B be accepted for the Commercial Services Plan. Thank You.</p> <p>Aloha, and most sincerely, Farley Jacob</p>	45
AL5000	Alternatives: General	I am in support of the Proposed Preferred Alternative B.	46
AL5000	Alternatives: General	We also agree that there need to be training sessions organized for tour guides / driver guides that will perform tours to the park. This is the main tool in educating the visitors to the park. The drivers/guides without the certification should not be allowed to enter the park in a commercial vehicle.	47
AL5000	Alternatives: General	<p>Comments on the Commercial Services Plan</p> <p>The purpose and need for the plan is stated on page 4. It states "the plan will determine how to ensure high quality experiences for visitors who participate in commercial tours."</p> <p>We believe that Alternative B, NPS preferred alternative, which provides the opportunity for 4 Concession Contracts for Road -based Tours, most likely utilizing mini-buses, does not offer any opportunity for a specialized CUA provider to continue to ensure the highest quality experience for visitors who participate in commercial tours.</p>	52

AL5000	Alternatives: General	Having read my copy of your Commercial Service Plan and being friendly with several of your Rangers, I am aware of the environmental impact horseback usage may be inflicting on the Park. Because of this, I would not encourage or support any expanded riding routing to any other portions of the Oheo area - or more horses.	54
AL5000	Alternatives: General	With deep respect for the community, we enthusiastically support the idea of the Park closure to commercial services to allow for Native Hawaiian cultural observances and festivities 3-5 days per year.	56
AL5000	Alternatives: General	1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan? I comment here as a private citizen, although I am often in and associated with HALE-NPS activities as a State of Hawaii Wildlife Biologist/Research or known as a Friend of Hale NP board member, and as a volunteer to the HALE NPS. I support the Preferred Alternative "B" in your draft plan- but see 2.	82
AL5000	Alternatives: General	1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan? Protecting the environment, rare species, endangered species, banning commercial bicycle riders in the park, promoting safety, training, controlling reckless actions and accidents within the park.	84
AL5000	Alternatives: General	1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan? With Alt. B, I support the proposal to prohibit commercial tours a few days a year. In Kipahulu, these may serve a different purpose and may or may not be the same as the days at the summit. While the term "Seven Sacred Pools" was created for visitor promotion purposes, the pools were in fact used for ceremonial purposes (according to information passed down in my wife's family who were practitioners of traditional Hawaiian spirituality).	85
AL5000	Alternatives: General	1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan? Limits to the # of CUA's, smaller vehicles (no buses), keeping customers of bike tours off of bikes in the park (reduces NPS liability as statistics show that there is a high occurrence of crashes by experienced bike riders). 2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they? -NPS training for all CUA tour leaders that teach/include conservation, safe practices, etc- a comprehensive training	86
AL5000	Alternatives: General	9. Incentives to incorporate traditional Native Hawaiian guided/owned tours/CUAs etc.	88
AL5000	Alternatives: General	Aloha, I would like to endorse plan A, no change to park usage. According to Government statistics [sic], park usage has steadily [sic] decline [sic] over the last few years, why would you want to further inhibit tourism to the park. Tourism to Maui is integral to our economy. Reducing the tours allowed would greatly curtail the ability of people unable or unwilling to make the drive up, including a large number of older Americans and foreigners [sic]. We should all be working to increase visitors to Maui, increase in visitors [sic] increases dollars and jobs on Maui.	92

AL5000	<p>Alternatives: General</p>	<p>Superintendent Haleakala National Park P.O. Box 369 Makawao, Hawaii 96768</p> <p>Dear Ms. Creachbaum:</p> <p>SUBJECT: DRAFT HALEAKALA NATIONAL PARK COMMERCIAL SERVICES PLAN AND ENVIRONMENTAL ASSESSMENT (EAC 2012/0012)</p> <p>The Department of Planning (Department) is in receipt of the above-referenced documents regarding the future direction for the management of commercial services in non-wilderness areas of the Haleakala National Park over the next 10 to 15 years. The National Park Service has provided an excellent description and comparison of alternative actions along with clear definitions of impacts of these alternatives and discussions of environmental consequences. The Department concurs that Alternative B is the preferred alternative.</p> <p>The Department understands the Commercial Services Plan and Environmental Assessment includes the following:</p> <ul style="list-style-type: none"> - The Plan will (1) determine what levels and types of commercial services are necessary, and/or appropriate, and consistent with the Concessions Management Improvement Act (1998) and National Park Service Management Policies 2006; (2) determine whether those services are compatible with the Park's mission of preserving and protecting natural and cultural resources; and (3) determine how visitors can be provided a high quality visitor experience; - The Plan does not cover the wilderness lands of the Park or non-commercial activities or facilities; - There are four alternatives and Alternative B is the preferred alternative of the National Park Service; - There have been four National Historic Preservation Act (NHPA) Section 106 consultations with Native Hawaiians, held with the Park Kupuna groups (traditional elders); and - The Environmental Assessment covers the affected environment and environmental consequences, with analysis of impacts to natural resources, cultural resources, visitor experience, public health and safety, socioeconomics, and park 	100
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AL5000	Alternatives: General	<p>In conclusion, I contend that the removal of motor-coaches or the restriction of commercial services within the park will have a detrimental effect on the park in the following ways.</p> <ul style="list-style-type: none"> -> Congestion will increase due to more one-and-two person automobiles being driven into the park. -> The parking in the park will become an even greater problem than at the current time. -> The reduced control and monitoring of visitors into the park with the reduction of commercial drivers acting as stewards of the park will damage the natural beauty of the park. -> The reduced control and monitoring of visitors will result in increased damage to sites of cultural and geological significance. -> Buses are a very safe, efficient means of allowing visitors into the park with professional drivers that are highly trained and closely monitored and regulated by both State and Federal Department of Transportation officials. -> Restricting motor-coaches from the park will significantly increase the carbon footprint of visitors to the park by dramatically increasing the number of vehicles required to transport those visitors into the park. -> Restricting motor-coaches from the park will impact the accessibility of the park to persons with special mobility needs. -> Allowing motor-coaches into the park could decrease the demands on the already over-taxed water and sewage systems in the park. <p>Respectfully submitted for your consideration, Duane A.K. Asami</p>	102
AL5000	Alternatives: General	<p>*P. 75, Summary Tables "... respond to those people who indicated that commercial services diminished their personal park experience..."</p> <p>Commercial services carry approximately 20% of park visitors (Refer to Figure 8 on C.S.P. page 101). Does the number of people that oppose commercial services approach that number? Is the number of people who took issue with motor-coaches in the park a significant number of the park's visitors? Clearly, thousands of people (over two-hundred-thousand!) prefer to have commercial services in the park and a majority of those commercial passengers enjoy the park by motor-coach.</p>	102
AL5000	Alternatives: General	<p>*P. 25, Paragraph 3 "Indeed, encouraging visitors to take tours rather than drive their own vehicles into the park should help reduce greenhouse gas emissions. Furthermore, by instituting new management directions for commercial services and reducing congestion at the summit at sunrise, the emission of greenhouse gases would be expected to decline."</p> <p>This quote taken from the C.S.P. clearly states that encouraging visitors to take tours should reduce greenhouse gas emissions. Studies show that motor coaches are clearly the most efficient means of transportation for reducing greenhouse gas emissions. (Refer to Attachment B, select pages from Getting There Greener a report by a conservation group called Union of Concerned Scientists.) Research has shown [sic] that the motor coach is the most efficient means of travel to reduce the traveler's carbon footprint when compared to trains, airplanes and automobiles, including the high-mileage hybrid automobiles. Yet Alternative B, the N.P.S.'s preferred alternative bans the use of motor-coaches in the park. This seems to be in direct contradiction of what the C.S.O. states on page 25.</p>	102

AL5000	Alternatives: General	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan?</p> <p>i like the idea of having less tour companies access to the park. Having so many companies just means having less control of what goes on. i think that whatever tour companies get approval really need to base their tours in accordance to the parks [sic] rules & be respectful to the lands [sic] history.</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>To look for a company that is: Extremely cooperative Hawaiian historic knowledge Small groups</p>	103
AL5000	Alternatives: General	<p>Aloha Sarah,</p> <p>Regarding hiking tours in Kipahulu, your draft indicates that you prefer to restrict the number of groups to one per day per company. This I do not understand,</p>	105
AL5000	Alternatives: General	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan?</p> <ul style="list-style-type: none"> - 1. Interpretive certified guide training by NPS. Limit to commercial activities that respect decorum of the park, no bikes or extreme activities. - 2. No commercial bikes in park. - 3. 10 year permits with limit on # of companies or types of companies. - 4. Some new permits may be issues in 2012!! <p>- 3. Limit commercial use to those companies that fulfill objectives of the park: preserve, protect park, educate visitors safely.</p>	106
AL5000	Alternatives: General	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan?</p> <p>I like that the preferred alternative plan will reduce the number of large 3-axle busses that clog the narrow roads throughout our park. Busses disturb the peaceful atmosphere because they produce excessive noise and air pollution. They also block the roads causing traffic problems and blocking emergency vehicle access.</p>	107
AL5000	Alternatives: General	<p>To all whom it may concern,</p> <p>We are writing regarding the Commercial Services Plan for Haleakala National Park. We feel that Alternative B is the preferred alternative, though we recommend several additions to the Plan.</p>	108
AL5000	Alternatives: General	<p>While we understand that the administration is opting for plan B, we have several concerns to this plan.</p> <p>The intent of Plan B seems to "limit" and "reduce." While we recognize the need to maintain the park experience, it seems that the proposed reduction of businesses and limitations on public enjoyment is counterproductive to the intent of National Park as quoted in the General Authorities Act which says that the parks are "for the benefit and inspiration of all the people of the United States." If the park is truly to be "preserved and managed" for the pleasure of the people then naturally there needs to be a continued management plan. However, the current recommendation plan seems to reduce the number of visitors, thereby diminishing public opportunity to enjoy our beautiful park.</p>	109

AL5000	Alternatives: General	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plans?</p> <p>The proposed commercial services plan encourages greater access for more people into areas of the park not easily accessible presently. Handicapped persons may be those who are too young or too old, or too overweight to walk up the mountain. Heart conditions and medical limitations will also prevent persons from experiencing the Kipahulu Natural Spirit.</p> <p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>The plan is very weak when it comes to addressing ADA issues. Basically handicapped persons are precluded from accessing even slightly remote areas of beauty and cultural importance. While some disabled persons may never safely reach the interior sphere, a large number presently do enjoy the mystical and ecosphere of the interior on horseback. But there is one corridor and two trails.</p>	110
AL5000	Alternatives: General	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plans?</p> <p>The increased accessibility to the interior of the park in Kipahulu.</p>	111

		<p>2012-TA-0402</p> <p>Ms. Sarah Creachbaum Superintendent Haleakala National Park National Park Service, P.O. Box 369 Makawao, Hawaii 96768</p> <p>AUG 31 2012</p> <p>Subject: Draft Commercial Services Plan Environmental Assessment for Haleakala National Park, Maui</p> <p>Dear Superintendent Creachbaum:</p> <p>The U. S. Fish and Wildlife Service (Service) received your letter and the Draft Commercial Services Plan Environmental Assessment (EA) for Haleakala National Park (Part) on July 2, 2012, requesting our review by August 31, 2102. The following comments have been prepared pursuant to the National Environmental Policy Act of 1969 [42 U.S.C. 4321 et seq.; 83 Stat. 853], as amended, and the Endangered Species Act of 1973 [16 U.S.C. 1531 et seq.; 87 Stat. 884], as amended (ESA). Based on these authorities, the Service offers the following comments and recommendations for your consideration.</p> <p>The Draft EA states that in 20 II, the National Park Service (NPS) initiated programmatic section 7 consultation pursuant to the ESA for all management activities at the Park. As a point of clarification, the Service and NPS are currently in informal consultation and NPS and Service personnel are working together to finalize the necessary information to initiate formal consultation.</p> <p>We look forward to continuing our work with you and your staff to benefit listed species and natural resources at the Park. If you have any questions or concerns, please contact Dr. Tim Langer, Branch Chief in the Consultation and Habitat Conservation Planning Program, at (808) 792-9400.</p> <p>Sincerely, [Unreadable name, may be Pat Ashfile?]</p>	
CC1000	Consultation and Coordination: General Comments		98
CC1000	Consultation and Coordination: General Comments	<p>We also propose that any new commercial application be reviewed by the Kapuna group that meets with the Park Superintendent and with the communities of Kipahulu, Kaupo, and Hana. We live in a small community with limited resources and a narrow, barely maintained road. All commercial services have a large impact here. We know the Park wishes to be good neighbors with the community and we hope you can address these concerns.</p>	108

DU100	Duplicate Comment	<p>Missing from the plan is a viable alternative of NPS shuttles running in the park similar to what the NPS employs in Rocky Mountain National Park. Banning commercial providers or restricting them is not going to stop visitors from going to the summit of Haleakala-it will simply force more of them to use their own cars which will cause more congestion and air pollution, not less because it goes the opposite from smart planning using mass transit instead of encouraging individual vehicle traffic. Instead of forcing more cars onto the roads, i would suggest studying the replacement of all vehicle travel within the park and replace them all with park shuttles. Perhaps an exception to the ban could be made for properly regulated bike companies as that could not be handled by the NPS shuttles. However, if private auto traffic were eliminated that could mitigate any issues with private vehicle/bike collisions which is the predominant source of conflict.</p> <p>A NPS shuttle system, employing low emission vehicles would allow visitors to park their vehicles or be dropped off by a bus and then use the shuttle system to hop on and off at different locations, thereby facilitating loop hiking, one way hiking etc. It would protect Nene and other wildlife from visitors vehicles replacing them with professional park shuttle drivers.</p>	8
GA1000	Impact Analysis: Impact Analyses	<p>One thing I don't understand is why the Hiking Tours, Horseback Tours, and Astronomy Tours are immune to any of the changes.</p> <p>Why is it that many many Roadbased tours will lose their business, when hiking and horseback tours probably do the most damage to the park and it's environment.</p>	2
GA1000	Impact Analysis: Impact Analyses	I think it is important to understand how our/NPS decisions can affect the Hana Road Communities and not have the same affect the communities up to HNP summit. I would be happy to discuss further if you have any questions.	28
GA1000	Impact Analysis: Impact Analyses	<p>Is the number of visitors the problem? Before any action, the big question, "What's the optimum capacity, specifically at sunrise?" needs to be answered. Backward engineer from this capacity # and provide preference to commercial service providers, not discrimination. It appears capacity is being set by parking stalls?</p> <p>Eliminating motor coaches completely? If the demand is expected to remain, then visitors offset by reduced commercial seats, will drive their own vehicle. The result will be increased carbon foot print and traffic congestion.</p>	34
GA1000	Impact Analysis: Impact Analyses	<p>it also reduces the noise from dozens of car engines starting, to that of a single bus. Also with regard to noise, we would encourage our guests in advance to refrain from cell phone use while enjoying the beauty of their surroundings.</p> <p>b. Also concerning our footprint with regard to resources, our Gray Line Motor Coaches are equipped with restrooms. Although currently disabled, we will restore them immediately if you agree that this would be yet another added benefit for resource conservation. We will request our riders to use the facilities IN OUR BUSES so that they take less of the already limited resources on site. Environmentally, this would save hundreds of gallons of water daily. Currently, the Mini Buses do not offer the same restroom capabilities and option for savings.</p>	56

GA1000	Impact Analysis: Impact Analyses	<p>c. I have discussed the occasion of a Motor Coach crossing the yellow, double solid, lane-dividing line on the Haleakala Highway with Duane Asami. He has indicated that there are four hair-pin turns upon descent of the mountain where the left front corner of the Motor Coaches' bumpers do indeed cross the lines while initiating these left turns. However, the seasoned Motor Coach driver is able to monitor ascending traffic on the switch-back below him or her due to the elevation and height of the coach. In turn, the Coach Drivers are able to slow or stop in order for the oncoming traffic to pass safely before initiating their turns.</p> <p>d. Our drivers that are qualified to conduct tours in the Park have a combined 135+ years of driving experience while employed with our company. Our most junior driver that frequents the Summit has over 2 years of driving experience alone with our company, and our average driver on the summit has over 5 years of experience. Familiarity with the highway and ever changing weather conditions mitigate the probability of accidents in our larger vehicles.</p> <p>e. According to the NHTSA (National Highway Traffic Safety Administration) database, there were 104 fatal crashes in the County of Maui in the 5 year span from 2004-2008. One (& only one) of those 104 crashes involved a category 3 vehicle (large truck or bus).</p>	56
GA1000	Impact Analysis: Impact Analyses	<p>I respectfully ask that you review my comments below, as I have conducted research regarding the possibility of Motor Coaches being restricted from entering the Park.</p> <p>1. In reference to excerpts from pages 72 and 184 regarding a potential increase in accidents due to motor coaches being on the narrow winding road, and "close calls" on the occasion that the wide vehicles may cross the center line:</p> <p>a. Drivers in the Motor Coach industry are required to hold a CDL (Commercial Drivers' License) and are bound to the highest safety standards enacted by the FMCSA (Federal Motor Carrier Safety Administration). Unlike other noncommercial license holding organizations, our drivers are required to successfully complete extensive training courses (FMCSA 49 CFR part 383), maintain safe driving habits which are closely monitored through continuing education and examination (annual Driver Improvement Program including classroom work and road evaluations), as well as annual submission of CDL Driver History Reports and voluntary completion of annual Violation and Review reports (FMCSA 391.51), and are subject to pre-employment, random, and reasonable suspicion drug and alcohol screening (FMCSA 382.101). I and my supervisors are certified (FMCSA 382.603) to recognize the indications of possible use of controlled substances or misuse of alcohol by anyone in a safety sensitive position in our organization. All of the above safety standards, along with additional company mandated safety regulations are administered in-house by our driver trainer Duane Asami, and regulated by our National Safety Council certified Safety Manager, Thomas Witt.</p> <p>b. Polynesian Adventure Tours has been a recognized member of iMG (International Motorcoach Group) since 2010. IMG's safety requirements exceed those of the FMCSA, and membership is restricted to operators with proven safety, quality, customer service, and financial stability records.</p>	56
GA1000	Impact Analysis: Impact Analyses	<p>Comments collected via flip chart at Draft CSP public meetings</p> <p>1. Vans and buses are too wide for Kipahulu community roads.</p> <p>8. Concerns with limits may increase negative impacts to adjacent areas.</p>	88

GA1000	Impact Analysis: Impact Analyses	<p>Impacts to the endangered nohoanu (<i>Geranium multiflorum</i>), a plant found in proximity to areas near the Haleakala Crater, are also evaluated in the Draft EA. Effect determinations rely on tourists remaining on established trails. However, the Draft EA discusses informal trails made illegally by tourists resulting in habitat destruction and possible loss of individual plants. Though the plan to increase training of guides is often discussed in Chapter 4 as a minimization measure, the Draft EA states that "the approval of a plan does not guarantee that the funding and staffing needed to implement the plan will be forthcoming." If tourists do not receive enhanced education to minimize their impacts on natural resources, and law enforcement is not funded in an elevated manner to curb establishment and use of informal trails, the Draft EA underestimates the impact of commercial services to individual plants of listed species and designated critical habitat. Significantly, NPS has made a "no effect" determination in all Alternatives for designated critical habitat of both the Haleakala silversword and Nohoanu. Activity off of formal trails is not consistent with this determination. For example, the Affected Environmental discussion in Chapter 3 states "soil degradation is also evident outside the designated viewing areas because visitors farther back from the railings cannot see- they move about seeking better views, sometimes to locations not intended for this use." We recommend the Final EA address this inconsistency.</p>	98
GA1000	Impact Analysis: Impact Analyses	<p>Table 21 of the Draft EA defines impact thresholds that are then used in Chapter 4 to evaluate the environmental consequences of each proposed Alternative Action. It appears the threshold definitions in the Draft EA are intended to be used consistent with ESA definitions. However, the Draft EA categorizes all Alternatives as likely to continue to affect each of the four analyzed species. These effects include trampling of the threatened Haleakala silversword (<i>Argyroxiphium sandwicense</i> ssp. <i>Macrocephalum</i>), disturbance of nesting individuals and nest abandonment of the endangered Hawaiian goose (<i>Branta sandwicensis</i>), or vehicular collision with Hawaiian geese or the endangered Hawaiian petrel (<i>Pterodroma sandwichensis</i>). Per the ESA and corresponding regulations, take of just one individual of an animal species equates to a determination of "likely to adversely affect." Therefore, loss of a nest or an individual would lead to a likely to adversely affect determination and should correspond to a "major" impact rather than the stated minor impact pursuant to the threshold definitions. We recommend revising this inconsistency in the Final EA.</p>	98
GA1000	Impact Analysis: Impact Analyses	<p>*P. 23, Paragraph 6. "Impacts to Cultural Resources".</p> <p>The impact on, "Opportunities for Native Hawaiian practitioners to conduct ceremonies in privacy and solitude..." is not solely or even predominantly increased by commercial tours. If there is an impact, it is probably a reduction of the impact. Passengers on commercial tours can be admonished by the driver to respect the sanctity of the cultural event or ceremony. Person(s) entering the park without a professional driver to instruct them may not realize the cultural significance and could easily encroach upon the privacy of the Native Hawaiian practitioner.</p> <p>*P. 23, Paragraph 7. Crowding and Visitor Conflicts "Conflicts have occurred between guided tour groups and individual visitors for parking spaces and for standing and viewing spaces. For example, parking lots are full and travel lanes become congested in the summit area at peak sunrise visitation hours."</p> <p>People will visit the park for the sunrise. Having or not having commercial vendors will not change that. What will change is that the very limited parking will be even more over-taxed. One mini-bus can transport a total of twenty-five passengers, most of whom would drive to the park if a tour was not available. The number of people at the viewing area would not be significantly reduced. However, twenty-five people would mean as many as a dozen rental cars causing even more severe congestion in the parking lot. A mini-bus takes up as much space as two smallish sedans.</p>	102

GA1000	Impact Analysis: Impact Analyses	<p>As far as safety, our drivers are put to a higher standard, and are tested on their diving skill every year. Most of them drive this road everyday and are familiar with the road, where as most tourist on rent-a-car are there for the first time. We put our driver to a random alcohol and drug test, where as rent-a-car clients maybe high on anything without being checked. Since 1983 the year I was transfer to Maui, I can only recall 2 accidents involving tour buses verses many accidents with rent-a-cars. We do not mind if we are mandate to a stricter regulation, but please reconsider the ban of motor coaches.</p> <p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p>	112
IP100	ISSUES - Park management issues	<p>Dear Ms. Creachbaurn:</p> <p>Subject: Draft Haleakala National Park Commercial Services Plan and Environmental Assessment</p> <p>Thank you for the opportunity to review this project. We have the following comments to offer:</p> <p>A food establishment permit is needed if any commercial concession distributes or sells food. Please contact the Department of Health, Environmental Health Services Division, Sanitation Branch at 808 984-8230.</p> <p>Should you have any questions, please call me at 808 984-8230 or E-mail me at patricia.kitkowski@doh.hawaii.gov.</p> <p>Sincerely, Patti Kitkowski District Environmental Health Program Chief</p>	73
IV100	ISSUES - Visitor use or experience issues	<p>The Summit and Oheo Gulch are destinations for our visitor, for most, this are the main reasons people come to Maui. We also understand that we are near a saturation point for these areas.</p> <p>This year we have made a decision not to add any more vans to our fleet, we have capped the number of people we will take on tour per day, like the NPS, concern for our visitor experience is important. Not being able to stop and share our culture, because of traffic, at certain points would be against our goals to share our culture. We also don't want to take people to culturally sensitive areas.</p> <p>For some of our tour guides, doing a Hana Tour is a way for them to practice their culture, by sharing, teaching, and enlightening the good people of the world. Having employment in this field is important to them, and to us.</p>	28

IV100	ISSUES - Visitor use or experience issues	<p>3. In reference to Impacts to Visitor Experience on page 174:</p> <p>a. A group of 55 visitors wishing to charter a Motor Coach would be required to charter 3 Mini Buses in place of the 1 Coach, should Coaches be disallowed from the Summit. This would incur a 60% price increase for the visitors from approximately \$1,478.20 to \$3,714.36 per trip. These rates are regulated by the Western Motor Tariff. Many visitors would be discouraged if the rates increased so dramatically and may opt to drive on their own if possible, or forego visiting the Park all together.</p> <p>b. Polynesian Adventure Tours is compliant with the DOT requirements for The ADA (49 CFR 37 189), and regularly provides disabled visitors the opportunity to visit the Summit via Motor Coaches equipped with wheelchair lifts. Each Motor Coach is capable of securing two wheelchairs. We currently have two equipped Coaches in our fleet, allowing for four wheelchair bound guests to take part in the same tour that able bodied guests do. Without these coaches, many guests would not be able to enjoy the Park experience.</p> <p>c. Motor Coaches are equipped with video players and monitors. We would be able to enhance the visitor experience by showing Park approved informative safety and interpretive programming to our visitors before, during and I or after entering the Park.</p> <p>I respectfully submit my comments for your review and consideration. Thank you once again for allowing us to take part in this critical time of decision making.</p> <p>Most Sincerely, Della M. Lampkin Polynesian Adventure Tours Maui Station Manager</p>	56
IV100	ISSUES - Visitor use or experience issues	It would be to the advantage of the National Park to address this market thus benefit financially from it. The cost per person would be greater and more protection of the resource would be gained from this niche market that would utilized smaller and more comfortable 8 passenger vans, Protecting and informing 8 guests about the National Park versus 25 guests is a huge difference in the quality of experience that these niche guests would receive and require.	91
MT1000	Miscellaneous Topics: General Comments	<p>Aloha! The CSP is silent as regards wilderness area services such as hiking & horseback riding and directs interested parties to the "wilderness stewardship plan". Is this plan currently available? When do you anticipate it will be available for review? My e-mail address</p> <p>Is doug@ponyexpresstours.com Mahalo</p>	4

MT1000	Miscellaneous Topics: General Comments	<p>In reading through the proposal, I noticed on very important issue missing- helicopter tours over the park!!!</p> <p>I had the pleasure of spending several days over the 4th of July in the Kipahulu camping area adjacent to O'heo Gulch. On 7/4/12, while enjoying a quiet morning at the campground, I saw no less than three helicopters fly very slowly overhead in one direction, stop over the falls, then slowly circle in order to return the way it came. Talk about an invasion of peaceful enjoyment and disruption of "place"!!!</p> <p>As a 12 year Maui resident and year after year park pass purchasing camper, I beseech you to include limitation on helicopter tours in this proposal. They also provide commercial activities within park boundaries and of all the vendors, I must say they are probably the most invasive!</p> <p>Thank you again for taking back this beautiful Maui and National treasure!</p> <p>Jeanne Reynolds</p>	6
MT1000	Miscellaneous Topics: General Comments	<p>Missing from the plan is a viable alternative of NPS shuttles running in the park similar to what the NPS employs in Rocky Mountain National Park. Banning commercial providers or restricting them is not going to stop visitors from going to the summit of Haleakala-it will simply force more of them to use their own cars which will cause more congestion and air pollution, not less because it goes the opposite from smart planning using mass transit instead of encouraging individual vehicle traffic. Instead of forcing more cars onto the roads, i would suggest studying the replacement of all vehicle travel within the park and replace them all with park shuttles. Perhaps an exception to the ban could be made for properly regulated bike companies as that could not be handled by the NPS shuttles. However, if private auto traffic were eliminated that could mitigate any issues with private vehicle/bike collisions which is the predominant source of conflict.</p> <p>A NPS shuttle system, employing low emission vehicles would allow visitors to park their vehicles or be dropped off by a bus and then use the shuttle system to hop on and off at different locations, thereby facilitating loop hiking, one way hiking etc. It would protect Nene and other wildlife from visitors vehicles replacing them with professional park shuttle drivers.</p>	7
MT1000	Miscellaneous Topics: General Comments	<p>However, one of the most precious resources seemly not well enough addressed is the peace and QUIET of the Crater. The steady stream of helicopters buzzing around the rim is awful and pretty much constant throughout the day. I suggest having days when helicopters are not allowed to buzz the rim, maybe and odd/even day schedule. Their noise is incredibly intrusive in one of the quietest places on Earth !?</p> <p>Furthermore the horseback tours... The horses do heavy damage to the trail and leave a nasty smelly trail of offal in their wake. The riders heavily impact Sliding Sands (Keoneheehee)by leaving their waste toilet paper everywhere. Over the last ten years, their rest/lunch stop area has become heavily littered with their bathroom stops. I think the horseback tour company should be mandated to clean up the debris, if nothing else. Limiting the horse back tours to five days a week is not enough to mitigate their impact. Also 12 riders is a too many at one time;they kick up a dust cloud that is troublesome for hikers, along with the above mentioned impacts, as well as damaging Silverswords!</p> <p>Thank you for allowing comments and for continuing to preserve our precious Haleakala. Sincerely, Robert Lovell - Makawao, HI</p>	9

MT1000	Miscellaneous Topics: General Comments	<p>I think that the idea of limiting commercial operations on the summit of Haleakula has good intentions, but could ultimately become a far worse problem under the current proposals.</p> <p>First, if 80 percent of the commercial operations are ceased, and currently nearly a million people use the services of commercial operators, then some 800,000 people will be left with only one legal option for visiting the summit: drive themselves. Maui has only recently begun to realize the benefits of public transportation. Our bus service has grown and finally both locals and tourists can leave the car behind. Imagine 400 to 800 thousand additional trips to Haleakula Summit annually!</p>	12
MT1000	Miscellaneous Topics: General Comments	<p>We just did a bike ride with Haleakala Bike Co. and our tour guide told us about this Commercial Service Plan. I would like to say that this company did a fabulous job and I feel that they should continue to give tours of the National Park. The guide was very knowledgeable, and did give us instructions on how to help preserve the park and the the area up there. I probably wouldn't have visited the park if not for the bike ride, but glad I did. And glad that I did it with Haleakala Bike Company. They were entertaining, informative, and had a low impact on other users and the locals.</p>	15
MT1000	Miscellaneous Topics: General Comments	<p>Our tour driver told us about Haleakala National Park and the forthcoming changes. After hearing what he had to say I wanted to submit my comments on how I thought Haleakala Bike Company enhanced my experience. The tour that he gave was very funny, entertaining, but also included a lot of information about the environment and safety. We learned about protecting endangered species, and where told of where to walk. Our guide actually had to clear other people, not with our group, off areas that we're not supposed to walk in. I think that the bike adventure we had after completed our experience, though it wouldn't have been as good without the park. Vice versa can be said about the park not being as good without the bike. Both experiences need eachother, and I don't think I would have visited Haleakala without the bike adventure.</p>	16
MT1000	Miscellaneous Topics: General Comments	<p>I have worked for Haleakala Bike Company for 8 years. Starting out as a guide my self, presenting customers with facts, information, guidelines, instructions on not only our bike ride but Maui and Haleakala National Park as well. Seeing value in my work ethic Ben Hall, CEO decided to move me to the office where I was able to progress and eventually become manager of the company. I was happy to do so, even though I enjoyed the tours, I was able to take what I know from being a guide and apply them to managing this company and it's staff. That would include things such as making sure our employees are not only well behaved inside the park, but also enforcers of the cultural and natural elements that make HNP so special. Because of this guidance our company has seen significant growth since my starting work here. From a fleet of 3 vans, to a fleet of 3 mini busses and 5 vans. Consistantly selling out our rides, maxing out our allowed spots at sunrise on a daily basis. The consensus amongs our guests is that we do a great job at presenting our tour both outside and inside Haleakala National Park. And this is why our company has grown in popularity, and why we feel that Haleakala Bike Company is an essential piece to providing excellent tours of Haleakala National Park.</p>	18

MT1000	Miscellaneous Topics: General Comments	<p>Customers of Haleakala Bike Co. on 7/11/2012, Sunrise Special.</p> <p>Q: Did your Haleakala Bike Co. tour guide provided a tour respectful of the environment and Hawaiian culture of Haleakala?</p> <p>A: Yes. Most Definitely! They repeated multiple times to stay only on paths to protect the environment and explained why it is so important.</p> <p>Q: Were guidelines and instructions provided to you within the park to help preserve the HNP resources and local ecosystem?</p> <p>A: YES. Several times. Clear concise directions were given plus a talk on flora & fauna was given around the silversword plants. The talk was interrupted twice to ask NON Haleakala Bike Company visitors to stay on the path and away from endangered plants.</p> <p>Q: Did you feel visiting HNP, the Summit, Crater, and Visitors center was an essential part of your overall experience with Haleakala Bike Co?</p> <p>A: YES. Most definitely. It made the experience a 12 on a scale of 1-10. One of our guides led the Hawaiian chant as the sun rose. VERY MAGICAL!</p> <p>Q: Would you have planned on visiting Haleakala National Park on your own without the included bike adventure?</p> <p>A: YES. But without the info given by the guides on the way there it would NOT have been as enjoyable.</p> <p>Q: Did Haleakala Bike Co. make your experience an enjoyable one?</p> <p>A: YES. MOST DEFINITELY</p>	19
MT1000	Miscellaneous Topics: General Comments	<p>Aloha, NPS Haleakala</p> <p>My name is Cory Goodman. I am a tour guide for Haleakala Bike Co. I have been taking guests to the summit of Haleakala for 10 years. I have been doing the sunrise chant for 4 years. You probably know me from my association with Nan, who taught me the chant. It is always a joy for someone to thank me for doing the chant and I inform them about referencing the Hawaiian Cultural website to get more info about it. In reviewing the proposed plan, many things come to mind, especially the concerns about care for the summit areas. I don't know how many times I have stopped independent tourists from taking lava stones out of the park or asking them nicely to get back on the trails. There are many guides who are Native Hawaiian. I have Hawaiian grandchildren who I have taken on bike tours from the top of the volcano. If you ask some of your staff like Emily or Wendy or Howard from Law Enforcement where my loyalties are they will certainly give positive opinions of me. I even gave a ride to a ranger who was to direct traffic at the parking lot for sunrises sometime in the last few years. I have missed using the park brochures for education, when I do "Cory's Crater College" after sunrise.</p> <p>EVERY TOUR I DO, I MAKE SURE MY GUESTS KNOW THAT IF IT WASN'T FOR THE PARK SERVICE, HALEAKALA WOULD GET TRASHED OVERNIGHT BY JUST THE FERAL GOATS ALONE.</p> <p>THANK YOU FOR PROTECTING THIS TREASURE!</p> <p>I hope to see some positive feedback at the meeting in Pukalani in August.</p> <p>Aloha, sincerely, Cory Goodman</p>	20

MT1000	Miscellaneous Topics: General Comments	<p>It is with great pleasure that I comment favorably upon the continued use of Park trails by Maui Stables. My husband, Robert, and I are owners of pasture land less than one mile from the Park. During that time, we have observed numerous benefits of having a neighbor like Maui Stables, including encouraging old and young families to become familiar with the true meaning of the Hawaiian culture. As you know, Maui Stables goes beyond the basic horseback ride by using authentic hawaiian language, chants and prayers during the ride. Maui Stables is a terrific ambassador of the Hawaiian people, and for that reason, we donate the use of our pasture lands each year to them.</p> <p>We have also observed what Maui Stables gives back to the community through employee salaries, maintenance of pasture lands, building good fences, assisting others in an emergency. My husband, Robert, has been in a near death situation where Maui Stable's owner, Ed Lincoln, came to his rescue. Simply, without Maui Stables, life in Kipahulu would not be as safe for both man and animals.</p> <p>We have been horse people our entire lives, and we understand the need for many visitors and residents to be able to touch and feel and smell and see and hear hawaii in a most natural way, on horseback. This is why the Park exists. The Park is there not only for hikers but horseback riders too. Horses allow more visitors to experience Maui's spiritual beauty and waterfalls than could access these areas on foot. Please do not deny anyone the chance to visit the inner tranquility of the park by limiting the number of rides. Instead, embrace the mission statement of Maui Stables: To Enhance The Visitor Experience In The National Park By Creating A Sense Of Natural Environment and Local Hawaiian Culture.</p> <p>In closing, we found Kipahulu on our honeymoon in the late 1960's when we first visited the Park, and we returned many times over the years while vacationing on Maui. But it was not until we took our first Park trail ride with Oheo Stables (the for-runner of Maui Stables) up the mountain to the falls in 1990 that we fully understood and appreciated Hawaiian culture. Upon retirement in 2002, we rode again, fell in love with Kipahulu, and we are now blessed with having our home here. There is something uniquely spiritual about Kipahulu and the Park.</p> <p>Thank you for this opportunity to comment upon the benefits of continuing the services of Maui Stables at the Park.</p> <p>Sincerely,</p> <p>Ruthie Jensen</p>	22
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MT1000	Miscellaneous Topics: General Comments	<p>Don't forget that Maui Stables promotes the same principles as the Park staff, that is to assist individuals in the safe enjoyment of the Hawaiian experience while promoting the Hawaiian culture. I have been riding that trail since 1990, and I have paid to ride with Maui Stables guides. The guides do such an excellent job of explaining Hawaiian culture and practices, that I would recommend every Park staff member to take the ride as well. It is a worthwhile education in Kipahulu history.</p> <p>If the CUA desires to regulate something important, regulate the areas of the seven pools closest to the ocean. There is real danger there! On the horse trail to Oheo Falls, that already is regulated and maintained by your partners at Maui Stables, and for the record, I have never seen anyone try to hike that trail. But if they did, and if they were to get into trouble with a sprained ankle or other injury, you know that Maui Stables would be there to help them.</p> <p>Sincerely,</p> <p>Robert Jensen</p> <p>Kipahulu, Hi. 96713 808-248-8844</p>	23
MT1000	Miscellaneous Topics: General Comments	<p>Park Planning Staff,</p> <p>I rode the bike tour down Haleakala in the spring of 2008. I suppose we must have begun outside the park boundry. My tour was safe and well guided. I understand that this activity can be risky. Many activities in National Parks are as risky, for instance climbing El Capitan at Yosemite. Even a seemingly low risk activity as hiking results in an average of 10-12 deaths per year at the Grand Canyon. When I obtained my first trans-canyon hiking permit, the NPS sent me a videotape with the warning in bold red letters "YOU COULD DIE". Here's the point, a visit sanitized of risk Disney-fyies of our National Parks and is just wrong.</p>	24

MT1000	Miscellaneous Topics: General Comments	<p>I would like to comment on the draft for the Commercial Services Plan, in support of Maui Stables.</p> <p>I have owned property in the Kipahulu area for over 22 years I am a small business owner. I am very familiar with Maui Stables and the operation of their business. I refer many of our clients to Maui Stables and have always gotten very positive feedback. The natural beauty of the Kipahulu area is a real draw for the visitors that come here. But we need small businesses, like Maui Stables, to provide activities to keep people here to spend money and give our community the kind of economic boost it needs, in an eco-friendly way. They do any excellent job of educating visitors to the national park about the Hawaiian culture and the history of the area. They enhance the visitors experience and give them a real sense of place. When visitors are on the Maui Stables horseback tour they know they are in Hawaii. The tour allows people with mobility issues to see a part of the park they couldn't see any other way. They are excellent stewards of the land and project the importance for ALL of us to be good stewards of the land, malahini as well as the kama'aina.</p> <p>Maui Stables is an asset to the community, supplying some much needed jobs and economic stability.</p> <p>I support the Maui Stables and their endeavor to run their tour into the national park as they see fit. I'm sure they will always keep the best interest of the community in mind.</p> <p>Sincerely,</p> <p>Sam Butterfly</p> <p>248-7824</p> <p>Samadhi Butterfly</p> <p>Ala-Aina Ocean Vista TOLL FREE: 1-877-216-1733 On Maui: 248-7824 or 248-7713 www.HanaBedandBreakfast.com</p>	25
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MT1000	Miscellaneous Topics: General Comments	<p>In response to the Commercial Services Plan:</p> <p>I have lived and worked in Kipahulu for over 20 years and I would like to go on record in support of Maui Stables doing rides into the national park in Kipahulu. I have personally been on their tour and can say they enhance the visitors experience tremendously by educating them about the Hawaiian culture and the natural fauna. They give first hand knowledge of all the native plants and their medicinal properties along with a history of the area. How else would people ever learn about these things? I have sent countless visitors on their tour and have had nothing but positive feedback. They have a 5 star rating thru TripAdvisor. I would recommend the park review the TripAdvisor site and see what others have to say about them. Maui Stables contributes to the vitality of our local economy. They are known through out the neighborhood as people who take care of the aina (land). The national park is lucky to have them!</p> <p>It made me nervous that you might put the stables out of business after reviewing the alternatives the park came up with for the stables. Although I myself do not have a preference, I would back Maui Stables in their choice.</p> <p>Mercurial Bleu 248-7713</p>	26
MT1000	Miscellaneous Topics: General Comments	<p>I did Manage Ekahi Tours about 8 years ago and I am familiar with Sunrise Tours to the Summit, but because we want to share the history, and the Culture of Hawaii, we find the Hana tour provides us with that opportunity so much more than the Summit.</p> <p>It is amazing the number of people that ask about swimming and the number who actually get wet. About 90% ask about visiting the Pools of Oheo and yet only about 3% even get their feet wet. Of course many have read that it is sacred, we correct them both before the tour (when possible) and while on tour. We do mention grave sites and Heiaus' being in the area. We don't point them out or tell them exactly where, because we don't want them or others to know for they may venture on their own.</p> <p>The unescorted visitor does not get the truth and continues to add to the deception by writing about it on the internet. We feel frustrated for the visitor makes decisions based on information they have received. Since the information is incorrect, we try to give them the correct information before they come to Maui, can you imagine picking a vacation spot only to find out you were deceived.</p> <p>We have even considered not visiting the National Park because of this deception, but realized that we would not be able to point out the truth each time we went to the park, a lack of teaching the truth is, in a way allowing the untruths to grow bigger. (Hope that makes sense)</p> <p>But I do share your desire and the National Parks Policy of preserving the National Park, no matter what; I support that over everything else. We also realize that we all have benefited from the preservation of the all the National Parks across our Nation; we would not have what we have now, here on Maui, without the National Park System.</p> <p>Raymond J Hutaff Valley Isle Excursions, Inc</p>	28

MT1000	Miscellaneous Topics: General Comments	<p>I had a visitor point down the Hana Road the first day the Hana Road was closed at 10 am in the morning to widen the road before Keanae, he made a very important statement; "I Paid \$5000.00 to go down that road". He was the first one to be stopped by the police, I happened to be there to have a better understanding of the work being done, and how it would affect our tours. During that period I never went back, I felt so sorry for people who were turned around. As sad as that was, I still agree, without question, that our responsibility is to preserve our Natural and Cultural Resources.</p> <p>In Kipahulu the parking area for land based tours is distant from the view Planes, the Visitor Center and the stream. Here, the opportunities to interact with the unescorted visitor are very rare. Yet all of us want to help, it is our nature as a people.</p> <p>Also the Kipahulu area offers a much better bathroom stop than the stops past Hana. We see a few vans/drivers that don't have permits to the park, stop for passengers in need.. We see this happening quite a few times around Kalepa and Alelele. We have spoken to other unpermitted tour drivers and they do their best to have waited until Kaupo Store, but Kaupo Store is not always open.</p> <p>Not giving the visitor choices on how they visit the Hana Road and the HNP at Kipahulu will cause more people to decide to go on their own. The unescorted visitor will cause issues with the communities and cause the HNP system to hire more people to manage the National Parks resources. (This actually could be good news for those who live out there and need employment)</p> <p>Also, having only a few Concession permits would increase the size of the Business that gets one. I have personally worked for Larger Corporations and find that as well as they want to be, the larger they are the harder the business becomes to manage employees and maintain safe vehicles etc. For our industry, the smaller companies do a much better job in most areas.</p> <p>I have made a commitment to our employees never to grow too big, if I lose sight of even one employee I will sell off one vehicle and return to the kind of operation I believe we should be. We have reached that point; we will not be adding more vehicles or increasing the number of employees. Therefore, if we were not separated from the Summit, we may not be able to provide our visitors with a tour up to the Summit. We would do our best.</p>	28
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MT1000	Miscellaneous Topics: General Comments	<p>Aloha,</p> <p>Please consider this my official comments to your Draft Plan.</p> <p>I would like to thank the Haleakala National park for assisting in preserving Haleakala's Cultural and Natural Resources. All of you have done an exemplary job for more than 40 years.</p> <p>Currently I am Chair for the Maui County Cultural Resource Commission, it so nice not to be concerned about the Cultural and Natural Resources within the National Park. Everywhere else on Maui it is a constant battle to get people to understand and act responsibly in regards to cultural and natural Resources. Your great work allows us more time to focus elsewhere. Mahalo Nui Loa.</p> <p>Who would know that when the first roads were built to the Summit, to offer the American Public easy access to the National Park decades ago; that we would be facing a dilemma of too many people.</p> <p>We share our appreciation of the NPS with all of our visitors that we take on tour. So much would have been lost without the NPS.</p> <p>Unfortunately the Kipahulu area does not offer the same opportunity for the CUA's to assist the Park as is with the Summit.</p> <p>In the past, our parking area was next to the path down to the pools and the visitor center, many unescorted visitor would stop to ask directions, and we were in a position to warn them about walking into the pools and let them know about trash and conservation issues. The parking area is much different now and there is no way for us to interact with the unescorted visitor. The Visitor Parking area and the rest rooms are a great way increase the visitor experience, but do not place us in an easy position to help.</p>	28
MT1000	Miscellaneous Topics: General Comments	<p>Aloha All,</p> <p>We are conducting tours in Haleakala National Park for 18 years and are specialized on German speaking travelers. We never had a moving violation nor an accident on Maui and none of our guests have ever been cited by rangers. But we often saw especially people out of rental cars trampling through the Ahinahina flower beds and taking short-cuts in the summit area. When we made them aware of their mistakes in a friendly manner, we have been called "Deputy Ranger" or "Junior Ranger"!</p> <p>Then there is the issue of public safety. When jet-lagged rental car drivers are tired on unfamiliar routes, it's dangerous for everybody. Consider only the fate of the three French tourist who perished in a rental car in the year 2007. According to table 17, page 114 there was no accident with commercial tours 2006 to 2009.</p> <p>Since we don't conduct Sunrise tours, we can't comment on that. But we never ever had a problem to find suitable and legal parking for our 15-passenger van during different hours during the day.</p>	29

MT1000	Miscellaneous Topics: General Comments	<p>The portion of their tour which encompasses the Hana Highway never interferes with normal highway traffic. The guides are to be commended for conscientiously keeping the horses and riders on the shoulder of the roadway.</p> <p>The park tours use special trails and do not share a concourse with hikers. Riders are able to see a section of the park hikers do not have the opportunity to enjoy: an inspiring overview of Pipiwai and Palikea streams, where they flow and merge.</p> <p>Ed and Lynn are true stewards of the land. Their horseback tour offers the most sensitive and comprehensive cultural and historical overview of any outdoor activity in the Hawaiian Islands. I laud them for the great care they have taken in offering locals and visitors an inspiring experience.</p> <p>I highly recommend that the park allow Maui Stables to continue its commercial horseback operation within the park unimpeded. It is a cultural gift from beautiful Maui to the world at large and not to be missed.</p> <p>Please feel free to contact me if you have any questions or comments.</p> <p>Aloha pumehana, Arabella Ark</p> <p>PO Box 667 Hana, HI 96713 tel. 808 248 4890</p>	30
MT1000	Miscellaneous Topics: General Comments	<p>Please accept this letter as testimony in favor of continuing the horseback riding excursions into the Haleakala National Park conducted by Maui Stables of Kipahulu owned by Ed and Lynn Lincoln.</p> <p>My name is Arabella Ark. I have resided in Hawai'i for over forty years, twelve of them in Hana District.</p> <p>My experience taking family and friends riding with Maui Stables has been nothing short of stellar.</p> <p>Ed and Lynn have created a beautiful stable in Kipahulu. The public area has large framed posters relating the history of the area, the paniolos, the Hawaiian culture, and more. There are large carved ki'i of the Hawaiian god, Ku near the entry, clean stalls for the horses, rain gear for riders, picnic breakfasts or lunches at tables near the corrals, lovely restroom areas, and beautifully manicured lawns and gardens to enjoy.</p> <p>The stable is quite close to culturally significant sites such as the old sugar mill, several missionary churches including Palapala Ho'omau (1857) where the aviator Charles Lindbergh is buried, many graveyards, and coastal landings for transport of sugar in long gone plantation days.</p> <p>Their staff, many born and raised in the Hana-Kipahulu-Kaupo Districts, share their mana'o with visitors to the stable. They explain the geography the ride will cover and its historical and cultural value. They blow the conch, chant a blessing in the Hawaiian language, and set a tone of respect before entering the beautiful natural world of Haleakala National Park.</p>	30

MT1000	Miscellaneous Topics: General Comments	<p>Thank you for:</p> <ul style="list-style-type: none"> - Putting in many days & hours developing this plan - Protecting & preserving this incredible public asset - Providing an opportunity for public comment <p>Like all our parks, Haleakala National Park's management faces challenges related to overuse, user conflicts and degradation. In Hawaii these challenges are magnified by the high percentage of rare endemic species and increased susceptibility to invasive species. To be successful one must balance environmental protection with users.</p> <p>Logic would suggest limiting non-commercial visitors is the appropriate action.</p> <p>HNP management is mandated by congress to cover operating costs. If current revenue does not cover management needs, than increase fees. If changing fees means, changing the tier assignment for the park, then so be it.</p>	34
MT1000	Miscellaneous Topics: General Comments	<p>Our goal as a company is to provide the best service possible to our guests and visitors of Maui. And we are able to best serve them when operating inside Haleakala National Park. And our best service can only be offered if the park is preserved. In the end both Haleakala Bike Company and Haleakala National Park look to obtain the same goals. And that is to preserve the park resources and provide visitors with the best experience possible.</p> <p>It has been a pleasure doing business with Haleakala National Park for the past 18 years. That business relationship has contributed to our continual growth in popularity and sales over the last several years. Likewise the relationship has been a benefit to the park in many aspects including introducing many many visitors to the splendor of Haleakala National Park. We look forward to continuing this relationship for many years, striving to continually meet Haleakala National Parks mission statement:</p> <p>"Haleakalā National Park is an International Biosphere Reserve that supports native ecosystems in a maturing volcanic landscape. As stewards of this park, we will incorporate Native Hawaiian protocols and generational knowledge for the perpetuation of cultural resources, and implement traditional and modern methods for the preservation of natural resources. With partnerships and the community, we will protect, manage, and interpret these unique resources for the education, experience, and inspiration of all peoples and future generations (NPS 2011b)."</p>	36

MT1000	Miscellaneous Topics: General Comments	<p>Sarah Creachbaum Superintendent Haleakala National Park P.O. Box 369 Makawao, Hawaii 96768</p> <p>Aloha Ms. Creachbaum,</p> <p>It was a pleasure to meet and hear from you at the Aug. 7, 2012, CUA Holder meeting. I am taking this opportunity to re-iterate, in a slightly revised format, the points of my original email to Ranger Moore on April 20, 2012.</p> <p>Cultural Access: I believe you are also aware of Akina Aloha Tours' unique distinction as a Native Hawaiian family-owned and operated Bus company. As such, we have deep cultural and familial ties to the Native Hawaiian community at large. Haleakala is a sacred place for our people, especially at Sunrise. We have had requests from Hula Halau to assist them with transportation to the Crater to express their Cultural Rights at Sunrise. This request, as you know, has been denied.</p>	40
MT1000	Miscellaneous Topics: General Comments	<p>First of all, with full knowledge that we need to protect natural and cultural resources, we would like you to know that we, commercial service provider, work as the first line to protect the park's natural and cultural resources through "education", considering as our mission.</p> <p>While providing our customers with high quality experience, we educate them on how to deal with the nature by talking about the natural resources including animals and plants, Hawaiian history, Hawaiian culture, manners and respect that we human beings must have.</p> <p>So we believe that we, commercial service providers, have contributed our efforts to it and of course we will continue to do. Moreover, we always make a positive and active approach not only to our customers but also to "general visitors driving a rent-a-car"; we, the guides and our customers, pick up any litter which general visitors throw out and we take it home with us, we speak to them to explain how to deal with Haleakala Ahinahina, Nene and lava, we lend them a helping hand by providing a first-aid, we let them use our booster cables to jump start their cars, that is to say, we believe that we always reach out our hands beyond the rangers and the park staff reach.</p> <p>Thirdly, as the action should be performed to protect resource conditions and ensure high quality visitor experience, we suggest to limit rent-a-car visitors as well, because we often find their outrageous conducts such as bad manners and their entrance fee unpaid. If commercial services are limited, the number of rent-a-cars would increase for sure. So, we seriously wonder if an increase of rent-a-cars could protect natural and cultural resource conditions or not...</p>	41
MT1000	Miscellaneous Topics: General Comments	<p>4) Visitor rates are down from 2007. Figure 8 page 101 shows that only 20% of the visitors to the Park are accompanied by commercial service providers. This means that 80% of the visitors are unaccompanied. However, it is the commercial service providers that are being accused of the majority of the damage to the Park environment. These commercial service providers are being penalized for damage done by unaccompanied visitors. Currently, the commercial service providers stay with their visitors (as required in order to awarded a CUA), and impart information about the Park, endangered species etc. It is these same commercial service providers that are being forced to cutback or eliminate their services all together in order to try to offset the 80% of unaccompanied visitor damage. Perhaps the Park should look at raising the individual entrance fees to the Park in order to be able to provide more Park personnel to oversee these unaccompanied visitors.</p>	43

MT1000	Miscellaneous Topics: General Comments	<p>2) "Concession Contracts"</p> <p>a) Bidding process - 36CFR 51.82 (a) states "Concession contracts will permit the concessioner to set reasonable and appropriate rates and charges for visitors provided to the public, subject to approval by the Director." (emphasis supplied) This gives the Director the power of approval of the rates charged by companies for their services.</p> <p>i) The company owner no longer has the freedom to set their own rates.</p> <p>ii) It also hinders/slows the owner's ability to change their rates as their expenses etc. change. (As we all know, the bureaucratic wheel turns at a slower rate than "Maui time" does.)</p> <p>b) Requires more detailed/extensive record keeping and storing in order to abide by 36 CFR 51.98 - wherein "A concessioner (and any subconcessioner) must keep any records that the Director may require for the term of the concession contract and for five calendar years after the termination or expiration of the concession contract" (emphasis supplied) Thus if the term of the concession contract is 10 years then it is conceivable that the company would have to store the records for 15 years.</p> <p>c) 36 CFR 51.99 allows that "The Comptroller General or any duly authorized representative of the Comptroller General must, until the expiration of five calendar years after the close of the business year of each concessioner (or subconcessioner), have access to and the right to examine all pertinent books, papers, documents and records of the concessioner," (emphasis supplied)</p> <p>d) As seen above, the Concession Contracts process give a lot of control of the company to the Director/Comptroller General and takes a lot of control away from the actual business owner.</p>	43
MT1000	Miscellaneous Topics: General Comments	<p>- Much of the erosion which can be seen from HVC at the rim of Ka Lu`u O Ka `O`o in the crater has been caused by thousands of individual hikers who took an old trail, then erroneously extended it around the rim of that cinder cone. The light colored dust from the erosion can be seen from miles away.</p> <p>- The only recent documented instance of feeding wildlife, nene, involved two volunteers with the "Friends of Haleakala," on a service trip, although it's apparent as the birds run up to you at Holua Cabin that it happens a lot.</p> <p>Commercial groups should be easier. They've been sitting in a bus for two or more hours, they enter the Park, then (Summit District) ride for another 30 minutes, and get disgorged into a huge slippery parking lot, in the dark.</p> <p>These are stake-holders in the National Parks, but we treat them like an afterthought. Would it be so difficult to have an Interpreter stationed at the turnoff at the Gate, or HVC, board the bus, greet the group, tender some hints on what's expected of them before they proceed? Three minutes. By such a simple act, they can become "welcomed" and vested in the common goals of the Haleakala, or Kipahulu.</p> <p>It is really about knowing how to behave, both for management as well as visitors. With more proactive management, guides and interpreters could be stationed throughout park areas. Greater numbers of visitors could be accommodated safely, as the needs arise, and with minimal impact to the resource base in these areas.</p>	44

MT1000	Miscellaneous Topics: General Comments	<p>- These "Vendors" provide a valuable service not only to tourists, but also to the Park in providing access to the views and the experience of partaking in the unique resources of the Parks.</p> <p>Finally, as most of you know, I am a "native" Hawaiian, not by the legal definition, but by koko, (blood lines,) Mana`o, (experience and affections,) and also through a naturalized Yankee immigrant, who eventually served the Kingdom of Hawaii as a representative in the House of Nobles. It is from this viewpoint, that I make the following observation:</p> <p>"E kipa Mai~" is the phrase of greeting in the native language. It is what I would say to you, being a kama`aina, (born from the land) as you came to my farm, or my home, or a Ho`ike, (open house.) If I viewed you as also a kama`aina, and as a person of good intent, I would not feel the need to say more, understanding that we had a certain comity of background. If I perceived however, that you were a person of good intent, but unfamiliar with the customs, I would gently and with good humor try to help you navigate the unfamiliar terrain, or food, or customs.</p> <p>At the Park, while signs help, and brochures can inform, if someone hasn't read or understood them, how will they know how to behave?</p> <p>It's not possible to individually greet every visitor into the park. However, outside of the walls of the two visitor centers, rangers are mostly not around to greet anyone. They are at registers, selling souvenirs, but rarely in the resource. If someone has a question about where they can stand, where they can walk, safety, where the trail branches, no one is readily available to assist, they have to seek us out. The thing about Kipakipa, is anticipating the guest's needs.</p>	44
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MT1000	Miscellaneous Topics: General Comments	<p>Comments on NPS, Haleakala's Commercial Services Plan, EA</p> <p>Commercial Operators in the "Park," out of all of the various kinds of park users, are probably the least problematic of all users to regulate; and with good management, possess the potential for having the smallest impact-footprint on the natural resources of the Haleakala summit area, as well as the culturally sensitive Kipahulu region.</p> <ul style="list-style-type: none"> - This is because of the nature of the contracts they enter into with the park. Commercial operators can be more easily monitored with regards to possible specific impacts they may have upon the resource base, by virtue of the fact that we know who they are, and can contact them. - The fact that most commercial operators use busses and multi-passenger transport vehicles to bring visitors into and through the park, serves to mitigate air pollution, and energy usage concerns. Commercial tour providers actually help to reduce traffic, and can lower the undesirable environmental impacts resulting from heavy dependence on private vehicles. <p>For the summit district, most normal visitor impact occurs primarily along "crater" road, as they travel to 3 destinations, at or near the summit area: Pu`u Ula'ula', the summit shelter, HVC, the visitor center just below Pa Ka`oao, (Pa` Ka`a oao) and Ka La Haku, the shelter overlooking the valley depression, 2 road miles below HVC. (Geographically a rather restricted area when compared to the total land area within Haleakala's boundaries.)</p> <p>Restricting the use of the larger coaches in transporting visitors into and through Haleakala-Kipahulu would become counter-productive at the point where it encouraged individuals as well as tour operators to bring greater numbers of rental as well as privately owned vehicles into the park each day; actually increasing parking and access problems at the two localities.</p> <p>Because of the greater economies of scale commercial providers allow individuals who might normally not have access to the National Parks in Maui County, because of physical or economic limitations, to share in the experience.</p>	44
MT1000	Miscellaneous Topics: General Comments	<p>However, it is disappointing the plan did not address at all the impacts and operations of the Summit horse tours. The Draft CSP states these operations will be addressed in a future wilderness plan. However, a CSP should evaluate all current commercial activities. There are currently many adverse impacts on-going from the horse tours on park cultural and natural resources. To postpone an analysis of these operations only allows these impacts to continue and worsen. In the initial CSP public hearings and scoping meetings with the Kupana, there was much concern expressed by the general public and Native Hawaiians about the on-going impacts from these horse tours. Also several of the VERP studies dealt specifically with these issues. So ample information should have been available to analyze these operations within this draft CSP. The cabins would also fall into this category -- it came up from the general public and as an in-park issues during the initial scoping.</p>	46
MT1000	Miscellaneous Topics: General Comments	<p>After all these years of discussions we hope that you will come up with a timely and satisfactory solution where all visitors to the park are represented and taken into consideration.</p> <p>Sincerely</p> <p>Juan Carlos Bianchetti Director Ole Tours Hawaii LLC</p>	47

MT1000	Miscellaneous Topics: General Comments	<p>Dear Sir or Madam:</p> <p>We are the Thomson's of Kipahulu, long time residents of the area. We were first introduced to the land by Uncle John and Auntie Babes Hanchett, whose cattle later roamed our land. The pasture is now grazing land for the Maui stables, whose presence in the area we have found to be invaluable.</p> <p>We understand there have been some complaints regarding commercial providers, but want to express how important we feel the Maui stables are to the local community, and the general public on the whole. It not only provides much needed work to locals in this remote area, but more importantly, through the service they provide, it is preserving our local history and culture, and sharing the love for the land in a very intimate and interactive way with visitors who would otherwise just whiz by the area. The Maui stables are a unique experience we tell all our visitors is a "must do".</p> <p>We have taken their rides numerous times and, while marveling at the sites and the beauty of the land rarely seen, know first hand that the practices of the Maui stables are sound and that they leave the land as it is found. We believe the Maui stables are an asset to the park, and the local and general community, and only hope more people would have a chance to experience their rides too.</p> <p>Sincerely, Akiko Thomson-Guevara SR 168C Hana, HI96713</p>	49
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MT1000	Miscellaneous Topics: General Comments	<p>I am writing this letter in the hopes that you continue to support Maui Stables. Over the past 10 years Maui Stables has developed a visitor experience that is not only excellent, but unrivaled on all the islands. And they have done so in a way that can only be described as pono.</p> <p>The horseback tour with Maui Stables, which begins with an oli as well as an excellent orientation and safety lecture, takes visitors into the National Park and ends with a spectacular view of Haleakala crater rim, 'Ohe o Ka Po valley, Waimoku, Waimuki and Palikea is an exceptional opportunity for visitors to see an aspect of authentic Hawaii. While on the tour, visitors are taught about the history of the Kipahulu area, the native and introduced plants along the trail, the ecosystem that has evolved in the Park and the way the area was cultivated in ancient times. Visitors are taught about Hawaiian spirituality, the respect Hawaiians have for the land, water and animals that share their home and the efforts we now take to protect our fragile native wildlife. The tour guide, Keane, takes great care in pointing out, and discussing the significance of, the archeological sites along the way such as the two he 'iau that flank the road on the way to the park and the ancient field system in the hills.</p> <p>It is gratifying that Maui Stables is owned and operated by native Hawaiians who are dedicated to perpetuating the Hawaiian culture and educating visitors to Hawaii about it. As Hawaii becomes a more popular destination for a global audience it will be essential that Hawaiian individuals and organizations remain true to their heritage and retain their unique traditions and way of living.</p> <p>Maui Stables is a vital part of the Kipahulu and greater Hana community. As a successful business, not only do they provide work for a number of local residents, but they bring visitors into the area, who then visit the Hasegawa general store, the Hana hotel, any number of roadside food and fruit stands and many others.</p> <p>In a town as small as Hana, where your neighbors are your family, the health of the entire community depends upon the health of each individual. The loss of Maui Stables could have negative consequences that reach far beyond the Hana town limits. Thank you in advance for taking the time to consider my perspective and please don't hesitate to contact me should you have any questions.</p> <p>Mahalo, Angela M Britten Director of Development</p>	50
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MT1000	Miscellaneous Topics: General Comments	<p>We believe that Temptation Tours fills the requirements for this specialized CUA. Temptation Tours maintains a fleet of Limo-Vans, staffs highly trained guides, has been servicing and satisfying clients the need and want this high quality guided tour since 1986. (Please see the attachments).</p> <p>Another comment: Alternative B was developed to ... "to provide opportunities for Native Hawaiians to conduct cultural practices without interruptions from commercial tours."</p> <p>Temptation Tours would happily donate complimentary transportation to the Native Hawaiian Community for one day of their cultural practices in the true spirit of Aloha.</p> <p>Mahalo for your asking for our comments and taking your time to read and assess them,</p> <p>Dave and Kathy Campbell, Owners</p>	52
MT1000	Miscellaneous Topics: General Comments	<p>Dear Superintendent:</p> <p>SUBJECT: HALEAKALA NATIONAL PARK COMMERCIAL SERVICES PLAN ENVIRONMENTAL ASSESSMENT (MAY 2012)</p> <p>We reviewed your request for the above-referenced project and have no comments at th is time.</p> <p>Please call Rowena Dagdag-Andaya at (808) 270-7845 if you have any questions regarding this letter.</p> <p>Sincerely, David Goode</p>	53

MT1000	Miscellaneous Topics: General Comments	<p>Dear Superintendent:</p> <p>At their request, I am writing to support the visitor horseback riding program presently being operated by Ed and Lin Lincoln in the Ohea district of Haleakala National Park. The Lincolns are Kipahulu neighbors of mine, good friends and admirable in their knowledge of Hawaiian culture.</p> <p>The continued integrity of the Park is and has been my primary interest, not outside commercial ventures.</p> <p>Circumstances which I treasure form these attitudes. In 19677 we purchased property in Kipahulu on the Kaupo side of Laurance Rockefeller's oceanfront land there (which as you well know is now part of the Park). Mary Tay and Sam Pryor were like parents to us, and Anne and Charles Lindbergh were very close friends. I was a pallbearer for him, and she stayed in our Kinahulu home before his services to avoid the press. From the very first the idea of somehow preserving Kipahulu in perpetuity was of vital interest to these individuals. It united us. To contribute my own energy I joined The Nature Conservancy as Hawaii field representative to fundraise and coordinate the Kipahulu Valley project. As you know, we were successful.</p> <p>I was fortunate to be included in a Conservancy ten-day-or-so "scientific" trip into upper Kipahulu Valley (mostly on the ridge above Palikea). The purpose was to stimulate national interest in our fundraising by identifying unique life form there. A side project was to collect blood samples from resident birds to check for traces of avian malaria (we found none).</p> <p>It was natural fur these early Conservancy activities to attract the attention of Haleakala National Park representatives, and I became close friends with Superintendent Russ Cahill (who even gave me a key to Palek u Ranger Cabin at "the top of Kaupo Gap to ease my many hikes through the crater with Conservancy potential supporters), and Sunerintendent Don Reeses.</p> <p>Sincerely,</p>	54
MT1000	Miscellaneous Topics: General Comments	<p>Aloha Sarah,</p> <p>First and foremost, I would like to thank you for your encouragement of our participation in the CSP process. Your patience, willingness to share ideas, and assistance given to all those involved to better understand the changes that are coming about is commendable. We have seen many changes at the Park over the years, and wish to continue our mission working together in preserving, yet promoting, our magnificent resources at Haleakala.</p> <p>We will continue to be stewards of Haleakala National Park and strive to deliver the highest quality visitor experience possible. In comparison to all other CUA holders, we have continually had the privilege to transport the largest number of visitors to both districts of the Park. We now hold shore excursion contracts with 95% of the Cruise Lines that will port in either Kahului or Lahaina regularly during season. I have presented Rick Moore with our projected passenger numbers for the remainder of the year for the summit area based on current preliminary orders from our customers, an astonishing 22,000.</p>	56

MT1000	Miscellaneous Topics: General Comments	<p>Kipahulu has forever provided for the economic well being of the local population, from aboriginal pre western thru sugar and ranching economies. The change of landscape with the acquisition of the Haleakala National Park has effectively transferred a third of that economy. While the park has improved it's efforts to employ from the local population, the majority of the revenue represented by the parks existence does not stay in our local community, a community that you are now a large part of. As a commercial use operator, the horse venture in Kipahulu is the only commercial operator within the park that has Kipahulu community credentials. While we hear you loud and clear about your priorities, please hear us about our prerogatives. Kipahulu is one of the few remaining neighborhoods in the Hawaiian Islands where native Hawaiians still remain on Royal Grant lands, tying them to this area before the arrival of Cook in 1778. To remain on their ancestral home lands and relevant to their culture in this rapidly changing environment, local employment is critical. As has been repeated often, the Hawaiian culture is a living, dynamic entity, not an archeological artifact. If you are sincere about protecting the culture, make available to us the tools that we need to succeed.</p>	57
MT1000	Miscellaneous Topics: General Comments	<p>Regarding ethnographic and cultural practices within the area of the park that is comprised of the existing horse trails, I will argue that the most of the historical access to this area was for hunting. The Park has a separate plan that provides guidance for hunting within the park, and current fencing suggests that access to these historical areas is not authorized for these purposes. In the 19 years that I have had accessed these areas (specifically all of the area from the government road to the back of the area known as the "flats"), I or any of our staff, or others that I have interviewed who have had access to the area, can recall ever seeing anyone up there for "cultural practices". Prior to the advent of the sugar planting, these lands would have been culturally designated as wao kanaka, or the Kula lands, accessible to kanaka maole for farming and hunting/gathering. The protocols that we use today to enter into these areas of the mountain are consistent with our ancestral protocols. The endemic resources that we encounter are left undisturbed and included as a part of our educational narrative.</p> <p>Our contribution to the visitor experience is the defining factor that sets us apart, not only from other activities within the park, but also from the 9 other horseback providers on the Island. Firstly, the section of the park in which we operate, currently allows for no other visitor access. This venue offers our guests the only opportunity to explore so much of the park in the short period of time they can allot, all the while experiencing the peace and solitude not available in the lower section of the Kipahulu area. By offering park visitors an opportunity to visit a different portion of the Kipahulu area, we are providing some relief to the congestion that would otherwise be directed to the visitor center during peak traffic hours and because the tour begins and ends outside of the park boundaries, entering the park on horseback, we put no additional burden on park facilities. In addition, the park is in itself the major attraction for most of our guests who are considering this horseback adventure.</p>	57

MT1000	Miscellaneous Topics: General Comments	<p>Ka mea iaia ka lima. Aloha kaua,</p> <p>I will start by thanking you and your staff for the effort put forth in an attempt to do the right thing within the guidelines of your mandate, for providing a long term vision for the preservation of Haleakala National Park.</p> <p>Regarding specifically the horseback use of the National Park landscape under alternative B, there has been only one operator since 2003 offering two trips per day, seven days per week. As a result of the road closure due to the October 2006 earthquake, only one trip a day has been offered. Before economic recovery in 2007, the financial collapse and resulting recession have forced us to maintain that schedule. The economics of those years have brought us to consider bankruptcy. The brighter outlook since July 2011 has given us hope to continue. However, due to the seasonal fluctuations in visitor counts, it is necessary for us to accommodate higher counts during these times to compensate for the off periods.</p> <p>Impact on the soils will not be much changed from the current usage, as we expect that our visitor counts are near our peak capacity. Future site planning will hopefully mitigate some of the impact due to rerouting of the trail, designated trail use (i.e.; no vehicle use), wider corridors that allow for the trail to dry, and variable trail assignments. Soil compaction under the trees at the turnaround point, root exposure and tree bark degradation are issues that need to be redefined. Under our, current understanding and agreement with past park authority, the usage of the existing trees (mostly guava) was preferred to removing the vegetation to install hitching posts. We would have preferred to cut back the canopy to allow for the soil to be more exposed to the sunshine. Damage to the road, we would need more information to comment.</p> <p>Vegetation. Considering that we have to work very hard to prevent the take over of the entire landscape by the invasive vegetation, we are contributing to keeping access to the region open. The presence of special status species in most of this area impacted by the horses does not appear to be an issue, nor do archeological, cultural or historical resources.</p>	57
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MT1000	Miscellaneous Topics: General Comments	<p>I strongly support Maui Stables in their continued use of the land and trail systems within Haleakala National Park at Oheo. Maui Stables maintains a vital presence within our Kipahulu community, providing jobs for local families, while promoting cultural and historical awareness in a spirit of authenticity and aloha.</p> <p>As a permanent resident, and land owner in Kipahulu, I am aware of the need to set land use protocols within our community and the surrounding park lands. Certainly, it is not without compromises and challenges that we steward this special place, and share in its beauty. I was not born here, but am linked to this land base historically, as my grandparents moved to Kipahulu in the late sixties. Charles Lindbergh, my grandfather, helped to preserve and establish some of the park lands at Oheo. In recent times, my family has enjoyed Maui Stables guided trail rides on these park lands, and found them to be enriching and educational. I feel the opportunities provided by the stables are aligned with my grandparents' wishes to honor and preserve the cultural integrity and the spirit of the land in Kipahulu.</p> <p>The staff of Maui Stables are hardworking, genuine people, who care deeply about the beauty and welfare of the land they live and work on. Their mana'o is imbued with respect for the spirit of a ina, and through this, they inspire visitors and community members alike, to cultivate a reverence for the natural history of the island, and the present day land-base and its people. This quality of experience is rare.</p> <p>One negative factor involving the use of livestock on park lands is of course, the spreading of exotic plant species. To the best of my knowledge, trails frequented by the horses have previously been exposed to grazing range cattle for decades. Maui Stables rides do not access ecologically pristine areas within park lands, so I assume their use does not amount to a significant weed threat.</p> <p>Apart from the weed issue, I cannot think of any other side effects in allowing Maui Stables to continue their oark trail use. Certainly, the many benefits outweigh any concerns. Again, I wish to express my full support of Maui Stables in their continued use of park lands, and in their honorable efforts toward educating the public about the land, culture and spirit of Kipahulu. Thank you for your concern and time.</p> <p>Aloha Nui Loa, Erin Lindbergh H.C.I 168-A Kipahulu, Maui HI 96713</p>	58
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MT1000	Miscellaneous Topics: General Comments	<p>RE: Maui Stables Positive Impact on the Community</p> <p>Dear Sir or Madam,</p> <p>This is a brief letter of support for the indispensable service that Maui stables provides the local and greater Hawaiian community. The owners and staff are the most dedicated and passionate ambassadors not only of the immediate area, but of the archeological and geological heritage of Hawai'i. No where else in the state can people better appreciate the uniqueness of the paniolo traditions that shaped this region.</p> <p>The families in this neighborhood have long sought the Lincoln's perspective as we explore how best to live sustainably and harmoniously with our environment. Their guides convey the importance of protecting indigenous customs, flora and fauna while providing visitors with an interactive, natural and minimally invasive experience that highlights the best of Hawaiian hospitality, environment and culture.</p> <p>Their business practices should be seen as a model for local business, balancing embracing critical tourism revenue while honoring tradition and respecting a harmonious relationship with the environment. One only has to see their reviews on Yelp and TripAdvisor to see the positivity of their impact.</p> <p>Very respectfully submitted, Ian Thomson</p>	60
MT1000	Miscellaneous Topics: General Comments	<p>To Whom It May Concern,</p> <p>My name is Jan Murdock, I am a resident of Kipahulu for some fifteen plus years. I am a licensed massage therapist in private practice and also employed by Travaasa (formerly Hotel Hana Maui). I have been involved in the tourism/service industry throughout my life and for the entire time I have resided on Maui. I am constantly in contact with locals and tourists alike, due to the nature of my business.</p> <p>At this time I wish to share my knowledge, feedback from clients and support of Maui Stables with you the Board and Superintendent and any other pertinent members overseeing the CSP. I have personally experienced the tour as well as my family and friends. I have spoken with numerous other participants of same everyone, bar none, has made similar comments ... it is the best part of their experience on Maui ... it is such an informative, naturalistic and cultural experience they are appreciative of the professionalism of the team at the stables, the care of the horses, the aloha shown to them in every detail of the tour. My personal experience was equally as awesome.</p> <p>In addition to this wonder-full experience Maui Stables provides a significant economic contribution to our community ... supporting numerous local families with employment and all attending partnerships with other business people in the valley, myself included. Their stewardship of the aina is evident from one end of the valley to the other ... and is imparted to the tourists, in the historical orientation, as they ride through the valley to the park and while within it's boundaries. The entire tour is very inspiring and it's positive impact on this community is priceless from the integrity of the team to the incredible "talk-story" day of Hawaiian people and their world that is now gratefully shared with me and many others.</p> <p>Thank you for your time and thoughtful consideration in this matter.</p> <p>With much aloha, Jan Murdock</p>	61

MT1000	Miscellaneous Topics: General Comments	<p>Aloha,</p> <p>As the owner/operator of a small business in the community of Hana, I submit the following comments in support of the Maui Stables in response to the current draft commercial assessment.</p> <p>1) Their economic contribution to the local community is significant. As with all small business, most of the revenue earned stays in the local economy. Maui Stables hires local Hawaiians and uses local subcontractors and suppliers. Haleakala National Park represents a large presence in our neighborhood and can contribute to the economic welfare of local families by promoting a partemership with local entrepreneurs.</p> <p>2. Maui Stables promotes and supports the Park mission and welcomes their presence as a guardian of these precious natural landscape. As practitioners of the Hawaiian culture, the message that they promote with their guests is consistent with ancient protocols and customs regarding our dependence on and reverence for the 'aina. Their conservation ethic and land/ranch mgmt practices are modem and practical.</p> <p>3. The mission of the Maui Stables is to educate and enhance the visitor awareness of the Hawaiian condition and local environment. The information presented is factual, historically precise and locally accurate. The kupuna involved with the creation of these narrative have significant historical involvement with the culture.</p> <p>I support the Maui Stables position, for the continued operation on the horse trail within the National Park, as they propose it to be.</p>	63
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MT1000	Miscellaneous Topics: General Comments	<p>Aloha,</p> <p>My name is Josh Stearns and I am the owner/operator small business operator of the Lau Lima organic farm in Kipahulu which my family has owned for 17 years. I am writing to offer comment on the Draft Commercial Services Plan under consideration.</p> <p>Although we primarily offer educational programs for aspiring organic growers, we also operate a retail outlet to supplement our operating budget. While we prefer to maintain the small town, rural complexion of Kipahulu, we also realize that it is that very remoteness that attracts the many visitors who travel thru our neighborhood every day. I have to say that the revenue these visitors bring to this community have made a significant improvement in the social and economic conditions of many local families.</p> <p>Maui Stables is one of the significant players in this cycle. Their contribution to the local families that they employ has been life changing. Their presence in the community enhances the rural aesthetic, and as we work simultaneously with them on large pasture projects, I will vouch for their land management practices. Maui Stables has a deep commitment to the preservation of the Hawaiian culture. I do know that their entire tour centers around cultural land practices, education and preservation of the culture and their relationship with the National Park.</p> <p>While I do not have a preferred choice of the options available, I trust that the needs of the stables will be compatible with my choice. I therefore support their choice of the options or any changes that they may see fit and necessary for their continued survival.</p> <p>Josh Stearns Owner Lau Lima Organic Farms Kipahulu, Maui</p>	64
MT1000	Miscellaneous Topics: General Comments	<p>Maui Stables supports the National Park's mission, which is to "promote the local culture and protect the natural environment." Maui Stables worked with a Hawaiian practitioner before opening so it could give people a true and accurate account of the Hawaiian people and their beliefs. Maui Stables also presents a historical orientation on the area, including the ational Park. Maui Stables enhances the visitors 's experience in the ational Park by giving them a sense of place.</p> <p>Maui Stables is a good steward of the land. This is reflected in their maintenance of the trail used for its tours, and in how well Maui Stables takes care of its own property and the pastures it uses.</p> <p>I trust that the needs of Maui Stables are and will continue to be compatible with the mission of the National Park. I support Maui Stables and its position for continued use of the horse trail within the National Park, as Maui Stables proposes it should be. I know from running Ohe'o Stables that it is a lot of work to keep such a business n.uming, and that there needs to be enough rides or riders per day to support the business itself, those who work for or perform services for the business, those whose land is used by the business, and those visitors and residents fortunate enough to be able to go on the horseback ride and get a unique, valuable, and inspiring opportunity to experience Maui and its natural beauty. I am confident that Maui Stables will be run with the best interests of our community in mind.</p> <p>Sincerely, Judith Neustadter Naone</p>	65

MT1000	Miscellaneous Topics: General Comments	<p>Dear Superintendent:</p> <p>I understand there is presently a process by which the National Park is reviewing the commercial use of its facilities, and that there is a discussion regarding the use of the Kipahulu District of the National Park by Maui Stables.</p> <p>I own property in Kipahulu (40685 Hana Hwy.), and have lived in Kipahulu since 1995. My property is in the immediate vicinity of Maui Stables's operations. I am also a former owner of Kipahulu Ranch, Ltd., which did business as "Ohe'o Stables," and was personally involved in its daily operations from 1995-2001. I am familiar with the services and the ride provided by Maui Stables, having gone on the ride quite a few times. I also have known the owners and staff at Maui Stables since before it started operating.</p> <p>I write to support Maui Stables in its efforts to continue providing horseback riding tours of the Kipahulu District of the Haleakala National Park.</p> <p>Maui Stables contributes greatly to the local community. The revenue generated in Kipahulu stays in the community. Maui Stables offers steady work to members of the community in all aspects of its operations. Beyond the horse tour guides, Maui Stables gives work to local residents for yardwork, hauling, horsetraining, and the like. Moreover, Maui Stables pays others for use of unimproved and vacant pasture land, keeping parts of the community in agricultural use and in its natural beauty. It is lovely to see the horses in their various pastures. The owners of Maui Stables are active contributors to the community, for example, owner Ed Lincoln is on one of the community's water boards, working to ensure satisfactory water delivery to Kipahulu residents.</p>	65
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MT1000	Miscellaneous Topics: General Comments	<p>To whom it may concern:</p> <p>On behalf of the Thomson family of Kipahulu, I write to express our support and appreciation for the Lincoln family and Maui stables. We are longtime residents of Kipahulu, having been introduced to the area by the late John Hanchett in the early 1970's. Uncle John's ranch cattle roamed our land for many years and some of our fondest memories are of his riding in on his horse to check on his cattle. The Lincolns and Maui stables have since taken over this responsibility and maintaining the ambiance of this special place is of utmost importance to us. Our family has significant pasture holdings here and, to say the very least, feel very fortunate to have Maui stables as neighbors.</p> <p>We understand there have been complaints regarding commercial providers in the area. We would like to express how important we feel Maui stables is to the local community, and the general public as a whole. There is a great respect for the Lincolns and Maui stables among the local community, and we are thankful for their efforts to maintain and preserve the land and share their unique knowledge of its history and its ancestors. We have discovered areas not usually accessible to tourists and park visitors through Maui stables and more importantly, their efforts have created much needed work to locals in this remote area. If you ever have the opportunity to meet any of the team at Maui stables, you will come away with a little more appreciation for our land and be truly inspired to preserve it more fervently. As for the many visitors we have recommended to Maui stables, the experience is always one of the highlight of their visit with us here.</p> <p>We believe that Maui stables is an asset to the park, and the local and general community, and feel very grateful for all that they do to preserve this special place.</p> <p>Sincerely, Julia Marsh Thomson-Fontana</p>	66
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MT1000	Miscellaneous Topics: General Comments	<p>Aloha,</p> <p>As project director of Preserve Hawai'i (www.preservehawaii.org), an environmental volunteering resource for visitors and kama'aina, and as a resident of Kipahulu, I'd like to express my support of Maui Stables as an important partner to the National Park in carrying out your mission and goals.</p> <p>Maui Stables has a long and reputable history of providing cultural and environmental awareness to visitors in Kipahulu Valley, while positively impacting our community. Their business practices emphasize holistic land stewardship, reliance on alternative energy sources, excellent animal care and pasture management, and maintenance of the local water systems. They provide employment to the Native Hawaiian community, and actively volunteer in the valley's reforestation programs. In essence, the Maui Stables staff not only promotes good Earth ethics to their guests, they live them themselves.</p> <p>Please consider negotiating a working contract with the Stables that will continue this good work well into the future.</p> <p>Mahalo for your time.</p> <p>Sincerely, Kirsten Watley</p>	67
MT1000	Miscellaneous Topics: General Comments	<p>To Whom It May Concern:</p> <p>SUBJECT: HALEAKALA NATIONAL PARK DRAFT ENVIRONMENTAL ASSESSMENT</p> <p>We reviewed the subject application and have the following comments:</p> <p>1. Solid Waste Division comments: a. None.</p> <p>2. Wastewater Reclamation Division (WWRD) comments: a. None. There is no County wastewater system in the area of the subject project.</p> <p>If you have any questions regarding this memorandum, please contact Michael Miyamoto at 270-8230.</p> <p>Sincerely, Kyle K. Ginoza, P.E.</p>	68

MT1000	Miscellaneous Topics: General Comments	<p>For these reasons and more, I urge you not to make any changes that would adversely impact this much needed economic venture in Kipahulu; but to ensure that this business flourishes for the benefit of its long-time residents; not to mention the educational value for our visitors wanting to experience a more authentic culture experience. We feature their tour not so much as a horseback riding experience, but an opportunity to learn about the Hawaiian culture in an environment that has not changed over the years. Because of the time and distance involved, selling this activity to our guests in Ka'anapali has not been an easy one, so I know first-hand what a struggle it has been for Ed and his wife, Lynn, to keep their business going.</p> <p>I believe that the relationship with the park and Maui Stables is unique and separate from the generic commercial users because they utilize a section of the park that is separate from and not included or listed for, any other use designation. My observation while on the tour was that they were more "stewards" than abusers of the land. Because of their frequent presence in this pristine area, they are able to take immediate correction actions; i.e., stray animals and evasive [sic] plants causing damage to the environment.</p> <p>Mr. Lincoln's strongly advocates a sense of self-reliance and confidence through accomplishment for the native Hawaiians of Kipahulu and is providing this venue for their own socioeconomic wellbeing. I applaud his efforts toward this end and trust you will too.</p>	70
MT1000	Miscellaneous Topics: General Comments	<p>Aloha e, Superintendent Creachbaum:</p> <p>Re: Comments on the Draft for Commercial Services Plan Environmental Assessment</p> <p>This letter is in strong Support for the continuation of the Maui Stables Horse Back Riding Tours currently being offered in Kipahulu.</p> <p>I first met Mr. Ed Lincoln, president of Maui Stables in June 2003. He had just started his business in Kipahulu. He scheduled a meeting with me to discuss the possibility of the 'Ohana Fun Center (our activity selling desk) at the Ka'anapali Beach Hotel, selling his activity at our desk. What struck me immediately about Ed was his sincere passion to provide a source of livelihood for native local residents wanting to remain in their birthplace, while earning a living for their 'ohana, doing what they believed in. During the course of our meeting, we soon realized that we both shared common business values, including aloha for our 'aina, malama for our people, 'ike or shared knowledge of our culture. We gladly added Maui Stables to our list of vendors and feature their activity for in our daily morning welcome breakfast for our guest.</p> <p>I have personally experienced Maui Stables horseback riding tour and was impressed by their operation. Specifically, the cleanliness of their stable and horses, strong emphasis on the Hawaiian culture throughout the entire tour, historic knowledge of the area, sensitivity to the natural resources of the park and the guide's obvious passion and love for his home land.</p>	70

MT1000	Miscellaneous Topics: General Comments	<p>Aloha.</p> <p>My family has owned and operated Ono Organic Farms in Kipahulu for 30 years, spanning three generations. As long time residents of this small agricultural community, we strongly support the small businesses' that can contribute to the local economy while maintaining the agricultural attitude and country style.</p> <p>The cowboy traditions have deep roots in this part of the Island and the only remnants of that industry are the Maui Stables. Many families still have horses here but no place to ride. The tours that the stables conduct in the National Park do a lot to share the history from old times to sugar times to ranch times. Much needed jobs for local families come from the stables. These guys share their knowledge, enchanting wonder and experience with the rest of the world. We can only hope they will continue to do so for many years to come.</p> <p>Showing ALOHA style- sharing our smile . . . and a better understanding and more caring way of life - Hawaiian Style.</p> <p>We support the Maui Stables.</p> <p>Mahalo</p>	71
MT1000	Miscellaneous Topics: General Comments	<p>Aloha-</p> <p>I am writing this letter in support of the Maui Stables in regards to the new Commercial Services Plan. My husband and I have owned property and lived in the Kipahulu area for over 30 years. We are business owners and have done work for both the Maui Stables and Lincoln family, the owners of the stables. We have had the pleasure of riding with Maui Stables into Haleakala National Park. In our dealings with them over the years we have come to the conclusions that;</p> <ul style="list-style-type: none"> - Maui Stables is an asset to the local community. - They take pride in what they do and run a first class operation - They are extremely knowledgeable about the Hawaiian culture and the history of the area - They enhance the visitors experience to the national park and are compatible with the parks mission statement to "preserve and protect its natural and cultural resources". - They have shown themselves to be great stewards of the land. - We support the stables and whatever option they deem necessary to continue their endeavor into the national park. <p>Sincerely, Patricia O'Connell</p>	72

MT1000	Miscellaneous Topics: General Comments	<p>They hunt pigs and deer, both of which are ruining the natural environment. They speak Hawaiian and hearing it properly for the first time I was awestruck. These guys are the real thing. They are involved with the community in many projects, helping the community, the park and the teaching Hawaiian traditions. The guides even mentor younger people to pass on the old knowledge before it's lost for ever.</p> <p>I think Maui Stables should be treated like a nearly extinct plant would be treated, with loving care. Don't fertilize and trim it, you might kill it, let it thrive where it is as it is. I know your intent is good, to make the park a great place for everyone to see in as close to its pristine condition as possible. My understanding of the initiative is also it's not to take financial advantage of a tourist based industry that was developed in the islands. Maui Stables is one of your greatest assets; people who take the ride get an education, will love Maui more and treat it better. Isn't that what we're all after?</p> <p>I guess to close I'll fall back on an old but true saying: "If it ain't broke, don't fix it."</p> <p>Thanks for your time Phil Smith Kihei 808 298-0903 Phi1Smith667@yahoo.com</p> <p>One last thought- They aren't the best at what they do, they are the only ones who do what they do.</p>	74
MT1000	Miscellaneous Topics: General Comments	<p>Some things to consider about Maui Stables</p> <p>My name is Phil Smith; I first came to Hawaii in 1959 as a kid just before it became a state. I returned many times over the years because of my love of the islands. I've camped here, stayed with a local family for 6 weeks while in college, stayed in condos and nice hotels. Three years ago my wife of 30 years passed away from cancer- we had 28 days warning to talk about our fives at the end of hers. We used to come to Hawaii, mostly Maui, at least once a year. In our conversations we touched on what I should I do with my remaining years. Our mutual decision was move to Maui because we both loved the place, so I did in Feb 1 2010.</p> <p>I still love doing all the things available on Maui and recently discovered Maui Stables. It's unlike anything else I've ever experienced on the any of the islands. If your goal is to protect Maui, then protect Maui Stables- by letting them do exactly what they are doing right now, giving people a full, very interesting and totally unique education about Hawaii, Maui, the local plants and animals and the Hawaiian people. I have never been so interested in history in my entire life. I wish all my teachers had been so well versed on their particular fields.</p> <p>Over time I've done most of the tourist activities- helicopters, zip lines, various boats, scuba, luaus, other horse rides, bikes, hikes, powered hang gliders, pretty much anything you can think of. Although lots of fun and usually beautiful, compared to Maui Stables these are more like amusement park rides. In general, the tourist industry is dumbing down the awareness of the culture- Maui Stables does exactly the opposite.</p> <p>This isn't like going to a luau, it's not Disney's new hotel, and it's not the Cultural Center. This is the real thing, these guys are not actors. The guides want very much for the visitor to see the natural beauty of the island, The National Park and the culture that grew out of a respect for the land. This is a piece of real Maui and real Hawaii, please treat it as such.</p>	74

MT1000	Miscellaneous Topics: General Comments	<p>Aloha,</p> <p>As a long time resident/property owner in Kipahulu, I generally categorize myself as a member of the silent majority. However, as the founding director of Ma Ka Hana Ka 'Ike, an educational program working in conjunction with Hana High School, to offer technical and vocational training in after school classes, I do not shy away from issues that impact our neighborhoods.</p> <p>It has come to my attention that the Park service is currently undergoing a commercial uses assessment. The specifics of the criteria that will determine the limits placed on the current commercial users is lost to me. but I am acutely aware of the potential impact to one local business should their access be limited by the new rules. Maui Stables represents the kind of corporate neighbor that this community desperately needs. Not only with the economic dynamic, but more importantly with the cultural and socially responsible message that they promote throughout their organization. In short, good managers of the land and people.</p> <p>In the interest of the Park's broader mission, and more specifically your responsibility to the local economy and community interests, a partnership with the Maui Stables is a step in the right direction for all the right reasons. I support the Stables in their effort to negotiate a working contract with the Haleakala National Park.</p> <p>Mahalo Rick Rutiz</p>	76
MT1000	Miscellaneous Topics: General Comments	<p>Furthermore, Maui Stables provides much-needed jobs to local families. All of their employees are Kipahulu residents, with a vested interest in the preservation of the area. The Stables also support local establishments providing lodging; its' website contains a list of recommended vacation rentals, inns and bed and breakfasts all in Hana and Kipahulu.</p> <p>In addition, the Lincolns' horses and staff provide an invaluable maintenance service to many property owners through their grazing and pasture upkeep. Without Maui Stables, many pastures would be overgrown with not only grass and weeds but also guava trees.</p> <p>A testament to the Lincolns' discretion, we have never witnessed any excessive traffic, litter, or other tourists on the paths used by Maui Stables' horses. On the dozens of trips my family has taken on the Lincoln's horses, we have only witnessed absolute care and respect for the terrain visited.</p> <p>It is no surprise that Ed Lincoln is a nephew of John Hanchett, and in his own way has taken over the ranching operations of the old Hana ranch. Like John, Ed and Lyn are providing an invaluable service not only to local families, but also to all who visit our islands. It is businesses like Maui Stables that help sustain, support, and enrich local community life. This is exactly what our community needs.</p> <p>We thank you again for your service in protecting Haleakala's resources and for your careful consideration of this important issue. Sincerely, Joshua, Julia, Akiko, and Hiroko Thomson</p>	79

MT1000	Miscellaneous Topics: General Comments	<p>RE: Commercial users agreement - Maui Stables</p> <p>Dear Superintendent;</p> <p>The Thomson family sends you warm regards and heartfelt gratitude for your management of Haleakala National Park. The Park is a special place for many, particularly those who call Maui and the Hawaiian Islands home. We are eager to support your mission of protecting and managing the Park, and on this particular occasion, to share our personal input on the Commercial Users Agreement, currently being assessed.</p> <p>Our recently deceased father, James Marsh Thomson, first visited Kipahulu in the late 1960s. Like many, he felt an immediate connection to and affinity for the area. Shortly thereafter, he was fortunate enough to purchase a tract of land, which has since become our family's home base.</p> <p>It was the late John Hanchett who introduced us to this land and community, often times on horseback, and taught us not only its beauty and abundance, but also its fragility and complexity. Through John's wisdom, we were able to understand the critical ingredients for this special community to continue to thrive: a delicate balance between livelihood, tradition, and care for natural resources. Habitation and enjoyment come with serious responsibilities.</p> <p>Ed and Lyn Lincoln, who own and operate Maui Stables in Kipahulu, have built their business on these same principles. Maui Stables is the perfect example of a sustainable, conscientious, local business. Through educational, guided tours, visitors are taught the importance of conservation, while Kipahulu's history and stunning landscape are showcased. Indeed given the amount of local knowledge one learns from a 2-hour horse ride with Maui Stables' staff, it is the perfect way to highlight the need to preserve all that is precious here.</p>	79
MT1000	Miscellaneous Topics: General Comments	<p>Alohakaua,</p> <p>Enclosed are a set of randomly collected, unfiltered, passionate guest comments over a period of one year that were intended, thru the vehicle of social media, to present to others who may have an interest, their personal evaluation and experience with Maui Stables. Understandably, much of it is irrelevant with regards to the details of the Commercial Services Plan, but the general theme can be gleaned, that our tour provides for the visitor and suggests, compliance with all of the Park's objectives.</p> <p>My intentions are not to bombard the administration with mindless testimony, however, I am aware that all have a voice in the process, including our/your guests. We together hope to present the service that the stables provides the visitor to the Park as unique, valuable and necessary.</p> <p>Mahalo A Nui Ed Lincoln President</p>	81
MT1000	Miscellaneous Topics: General Comments	<p>3. Do you have any other comments related to this draft commercial services plan?</p>	82

MT1000	Miscellaneous Topics: General Comments	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan?</p> <p>Selective Commercial users (I & E)</p> <ul style="list-style-type: none"> - community economic base - benefits [sic] the community - concerns w/ limits to park will impact other areas of community 	83
MT1000	Miscellaneous Topics: General Comments	<p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>Limiting rental car entrees, educating people before entering the park, zoning off areas to protect more species, restoring native plants, clearing invasive species,</p>	84
MT1000	Miscellaneous Topics: General Comments	<p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>In Kipahulu, it would be appropriate to have huiwai (?) or other protocol during a closed period where the ceremonies would not be interrupted. In addition, it may be helpful in a biological sense to provide a closure of the pools during the opac (?) migration period (summer) especially after periods without a lot of stream flow when the pools could potentially get clogged up with oil from visitors' sun screen, etc. and the opai (and thereby the whole nearby ocean ecosystem that they help feed) might benefit from letting the pools rest and clear out from time to time. I'd like to suggest even some scientific study of the impact of visitor use on the stream biology and whether or evenmore frequent commercial prohibition days or pool closure may be appropriate for biological/ecological reasons. Also support commercial operators being required to provide education on impact of sunscreen , etc. and if there are more evo-friendly alts.</p>	85
MT1000	Miscellaneous Topics: General Comments	<p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>Impact of horses on trails- invasive species and trail degradation- would like to see this impact addressed fully in Draft, as a hiker, this impacts my enjoyment, picking up and cleaning horse poop by CUA.</p> <p>Thank you!</p>	86
MT1000	Miscellaneous Topics: General Comments	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plan?</p> <p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p>	87
MT1000	Miscellaneous Topics: General Comments	<p>3. Community would like the park to require operations to clean any litter or debris they create on public roadways.</p> <p>4. The number of vans or buses coming to Kipahulu would be the same if the park was not here.</p> <p>5. "Selective" commercial users (fee) tour vans/buses.</p> <p>6. Community "economic base"</p> <p>7. Benefits to adjacent community</p>	88

MT1000	Miscellaneous Topics: General Comments	<p>My uncle has taken classes at the Bishop Museum on the culture and worked with Kenneth Emory on a field expedition at Wa 'awa 'a on the Big Island. He is a 1964 graduate of the Kamehameha Schools and in 1996 while the president of the Kamehameha Schools Association of Maui. he was approached by then trustee Oswald Stender to break a story of corruption within the biggest Native Hawaiian Trust, the Bishop Estate. He was embattled for four years, that concluded with the imprisonment of one of the trustees, initiating major changes in the tax obligations for the trust, and sat on the committee to appoint the interim trustees, a job formerly entrusted to the state supreme court justices.</p> <p>My uncle was raised as a child in American Samoa, and has spent a significant part of his adult life traveling throughout the Pacific to help governments establish commercial fisheries. During these travels, he was deeply reminded of his Polynesian roots.</p> <p>I can't even begin to wonder what I don't know about this man. But from what I do know, I would venture that you have a real cultural resource right under your nose. There may be kupuna who claim to know, or may know more about certain traditions specific to their area, but I know that with the oral traditions, the story tends to get changed to suit the current storyteller. I believe that my uncle Ed Lincoln brings to the Hawaiian story the reality of truth, no matter how painful to some, and his blend of historical and contemporary lore tell the story that will help native Hawaiians accept their past and move on into the 21st century.</p> <p>I submit the above with humility Me ka ha'aha'a Lehua Bray</p>	89
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MT1000	Miscellaneous Topics: General Comments	<p>Aloha, While on a recent visit with my ohana to Kipahulu, my uncle shared with me the assessment that the park is currently putting his horse business thru. I could not help but notice how many reference are made to the Hawaiian culture and the comments that are attributea to the kupuna. First I want to identify myself as a student of the Hawaiian culture, hula, and language. But more importantly, my family mo 'okuauhao (genealogy) includes some of the most storied Hawaiian practitioners of contemporary times.</p> <p>If you are placing so much weight in your decision making process on the word of the kupuna, it would do you well to know something about who you are dealing with. As someone who knows, I want to share with you something about my uncle, Ed Lincoln.</p> <p>First of all, in contemporary times, there have been only a few great Hawaiian men who had managed to survive the western transition with their spiritual culture in tact. Two of those men were my great grandfather (daddy Bray) and his son, my grandfather (papa Bray). These men were the most renowned, practicing Kahuna lapaau of their times. During the latter years of my grandfathers life, my uncle, Ed Lincoln became the curator of the Bray Foundation, caretaker of the ahu and the historical artifacts of my family's past. During this time he was the closest person to receive the knowledge that my grandfather had acquired from his father.</p> <p>These subsequent stories I have heard from others including my uncle. He lived in Napo 'opo 'o and associated with auntie Iolani Luahine, last of the Kalakaua court dancers, George Naope, founder of the Merry Monarch Festival. His neighbor for four years was Sam Kamakau, great grandson of the historian of the same name. He worked with Julian Pekelo, authority on the Kekaha district, to re-intem and conceal many Hawaiian burial caves in 1969 thru 1972. In 1973 he was selected as one of the foremost experienced waterman in the islands and invited by the canoe authority Tommy Holmes, to join with an expedition to test the proto type sailing canoe, predecessor to the Hokulea. Upon returning from that expedition, he joined the founding members of the Kahoolawe Ohana, during which time he became friends with uncle Harry Mitchell, one of Maui's outspoken kupuna sovereignty activists.</p>	89
MT1000	Miscellaneous Topics: General Comments	<p>I understand hat [sic] the footprint of the parking cannot be expanded in the park, perhaps you could look outside the park to landowners willing to lease land for additional parking and provide a shuttle to the summit, creating additional jobs.</p> <p>Thank you Ellen Manastyrski</p>	92

MT1000	Miscellaneous Topics: General Comments	<p>Tour operators and transportation companies offer a service to many of our visitors that may not have access to Haleakala. Many of the operators offer not only transportation services but also informative guide and language assistance to enhance our visitors travel.</p> <p>I would also like to point out as these businesses must operate with a license, insurance and proper qualification to transport visitors. I am sure visitor's safety is a great concern for all of us; with our pro-fessional and knowledgeable staff we are aware of road conditions and any weather challenges that may jeopardize the safety of our passengers. We offer a safe and relaxing tour for many of our visiting guests so they may take in the beauty of the sites and leaving the driving to us creating a safer condition for everyone.</p> <p>We would like to ensure we can continue to be a support and source of information and safety to our visitors. Please let us know if you require additional information or documentation to continue access to Haleakala National Park.</p> <p>Mahalo</p> <p>Muneaki Nozoe President/Owner</p>	94
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		<p>P.O.Box233 Makawao, HI 96768</p> <p>August 28, 2012</p> <p>Superintendent Haleakala National Park</p> <p>Dear Superintendent,</p> <p>I have been an avid Park user since 1969. The Crater is a special place where I go to renew and commune with the splendor and silence of nature. Over the years I have seen changes, both good and bad. The helicopters of the 1980's were intrusive and the fencing off of the Park encouraged there growth of native plants.</p> <p>The recent use of the Park by for-profit companies have created chaos in a once pristine environment. Now when we go to the top to hike through or spend a couple of days in the cabins, we are inundated by unchecked tourism at its worst. At the top are numerous bike companies, barking out instructions to their clients. Not to mention the hazard on the roads. I have even seen bike tours take their clients to the top when we all know there is a Kona storm coming. The poor bikers are pelted by wind and rain in a dangerous situation and some are children ... all for the profit of the company and disregard for the tourist.</p> <p>The tour buses leave their engines running at the top, presumably to keep the buses warm. So as a hiker we encounter a Crater that smells like diesel fuel and shouting guides and all the rangers spending their time directing traffic. lfs hardly pristine or a chance to be with nature.</p> <p>Once in the Crater, the trail down to the bottom of Sliding Sands has been degraded by the use of horse tours. I am sure the Parks spends money and time restoring the trails. It has made the hike down more difficult.</p> <p>I am glad you have taken a stand to help restore our beloved Crater to some sane balance. Haleakala Crater is a unique place on our planet and we must protect its integrity for future generations. It is not an easy task to limit for-profit tourism and I know there are arguments pro and con. Thank you for taking up the issue to restore some balance to our special place. I back the plan to scale back on commercial use within the Crater boundaries.</p>	
MT1000	Miscellaneous Topics: General Comments		96
MT1000	Miscellaneous Topics: General Comments	2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?	97
MT1000	Miscellaneous Topics: General Comments	Actual mortalities of Hawaiian goose and Hawaiian petrel. may even be higher than documented because predators may drag them off and consume them Without . detection by NPS personnel.	98
MT1000	Miscellaneous Topics: General Comments	<p>Dear Sarah,</p> <p>Over the years, the crater horseback trips have ruined the sliding sands trail and I would highly recommend reducing these tours. (Kipahulu horse tours do not have a big impact, as they do not share the trail with hikers). In addition I support reducing the number of helicopter flights around both the crater and Kipahulu!</p> <p>PS: Would really like to see local residents with free daytime access- we used to.</p>	99

MT1000	Miscellaneous Topics: General Comments	<p>3. On page 111, trail signs help to protect natural resources. Please increase signage to protect natural resources, promote "Leave No Trace Ethics", and provide education on Native Hawaiian traditional cultural practices within Park lands.</p> <p>Thank you for the opportunity to comment. Should you require further clarification, please contact Senior Planner Mary Jorgensen of the Long Range Division at mary.jorgensen@mauicounty.gov or at (808) 270-8241, or Staff Planner Kurt Wollenhaupt at kurt.wollenhaupt@mauicounty.gov or at (808) 270-1789.</p> <p>Sincerely, WILLIAM SPENCE Planning Director</p>	100
MT1000	Miscellaneous Topics: General Comments	<p>Aloha,</p> <p>This packet contains the final comment submission for Haleakala Bike Co. regarding the Haleakala National Park CSP draft.</p> <p>Along with the comment submission I have included nearly 200 testimonies from Haleakala Bike Co. customers. They were surveyed on random days over the past month inquiring them about their experience with Haleakala Bike Co. WITHIN HALEAKALA NATIONAL PARK.</p> <p>100% of the customers surveyed found the information provided to them by our guides within HNP was essential and helped them become better learned about the park, natural and cultural resources, and the importance of preserving the area. This plays into the overall enjoyment of their experience within Haleakala National Park. Furthermore a large percentage of those surveyed have expressed that without the self-guided bike activity included, there is a good chance that they would not have visited Haleakala National Park.</p> <p>I include these comments to display the necessity of commercial services such as ours, and how it benefits our visitors as well as Haleakala National Park.</p> <p>Thank you for your efforts and consideration to our comments.</p> <p>Mahalo, Lewis Upfold- Manager Haleakala Bike Co.</p>	101

MT1000	Miscellaneous Topics: General Comments	<p>Denali National Park does not generally allow personal vehicles into their park. Visitors can drive in as far as the Visitor Center but can go no further unless they take passage on a commercial vehicle. This does not diminish the park experience for visitors to Denali. Actually, with very minor exceptions, it is the only way to experience a majority of the park lands. The only way to drive into the park is to participate in the annual lottery in which four-hundred cars (per day) are allowed into the park on four days in September. If the park is closed due to weather, the entry fee is refunded and the permit is rescinded. The maximum number of personal vehicles allowed to drive into the park, then, is 1,600. All other visitors must stop at the visitor center and may go no further except on a tour or shuttle bus. (Refer to Attachment D) I do not believe that it would be possible to so severely restrict entrance into Haleakala National Park. However, Denali National Park operates under the same Federal mandates for preservation of the natural and cultural resources of their park and they have adopted a very interesting means to comply with those mandates.</p> <p>* P. 75, Summary Tables "... opportunities for Native Hawaiians to conduct cultural practices without interruptions from commercial tours..."</p> <p>If we have offended, and I have never seen any such occurrence, we need only to be made aware of any Native Hawaiian cultural practice and we can advise our passengers to avoid the area. Commercial drivers are able to enlighten commercial passengers of the significance of Native Hawaiian cultural activities. This cannot be said of the typical person driving into the park. No one is going to tell the average drive-in visitor to avoid an area unless a Ranger happens upon a situation. By that time, it could be too late. Commercial visitors can be told before they exit the vehicle.</p> <p>* P. 77, Summary tables "...with fewer tour groups using the park and increased training..."</p> <p>People will go to the park whether we take them in by motor coach or not. The difference is that without someone there to monitor their activities, they are more likely to cause long-term damage to park resources.</p>	102
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MT1000	Miscellaneous Topics: General Comments	<p>The following are excerpts from the Denali National Park website.</p> <p>"Take a bus into the park</p> <p>"Beyond mile 15, the road turns to gravel and traffic is primarily restricted to buses. We encourage all visitors to take some kind of bus trip while in Denali, as it is a great way to experience the park and build lasting memories.</p> <p>"To learn why the Park Road is closed to private vehicles beyond mile 15, click here</p> <p>"To learn about the accessibility of buses, as well as other park features, click here</p> <p>"Types of bus trips</p> <p>"There are two main types of buses in Denali- shuttle buses and tour buses.</p> <p>"Shuttle buses Cheaper than tour buses, and more flexible in that you may disembark/re-board anywhere along the road, shuttle bus drivers aim to help you experience the park on your own terms. Shuttle buses stop for wildlife viewing, restroom stops and beautiful scenery, just like tour buses. They are not narrated, however. There are four shuttle bus options, of varying length.</p> <p>"To learn more about shuttle bus destinations and additional information, click here</p> <p>"Tour buses "Your drive is your narrator on the tour buses, and he or she will provide a detailed and captivating program to accompany your journey along the Park Road. Tour buses make the same restroom stops as shuttles, and of course will pause for views of wildlife and scenery. All tours offer either a snack or full lunch. There are three tour bus options, of varying length"</p>	102
MT1000	Miscellaneous Topics: General Comments	<p>Dear Superintendent Creachbaum:</p> <p>I am the driver trainer at Polynesian AdventureTours. I am also a native Hawaiian and graduate of the Kamehameha Schools. I am a motor-coach driver with nearly twelve years in the tour industry after my retirement from the Maui Police Department as a police lieutenant. I have visited 26 States and Washington, D.C. from Fairbanks, Alaska to Bar Harbor, Maine. In those travels, I have been to many National Parks and met Native Americans from several tribal groups including Flathead, Hopi, Haida and Navajo. I come from a very eclectic background.</p>	102
MT1000	Miscellaneous Topics: General Comments	<p>It is only fair for the companies [sic] that are chosen to be locally based because why would the people that live on Maui need mainland owned companies to be doing tours on Hawaiian land, just to make money? When they don't even live here, that's [sic] kind of messed up, I think.</p> <p>Locally based</p>	103

MT1000	Miscellaneous Topics: General Comments	<p>Aloha Sarah,</p> <p>Congratulations on doing a wonderful job last evening! I thought you were sincere, succinct, open and covered all the important points in your presentation which left little questions at the end. You simplified what could have been a very difficult process to explain. I liked that!</p> <p>As mentioned to you, I sent a hard copy of my attached letter to you in the mail, but thought I'd email a copy as well. I believe Ed's heart is in the right place, doing the right thing for the right reason. He's the "little guy" asking for help from the "big guys". I'm hoping the "big guys" will find a way to support him. Having been on his tour myself, I can attest to the fact that his guides are more "stewards" of the land than users, as they were making sure there were no stray animals causing damage to the pristine environment there. The passion the guide had for the land that has been in his family for several generations before him also was evident. Sarah, you know and I know, we are put in positions of decision-making for a reason. I see a Leader in you; one that is not afraid to make the tough calls (like Marilyn did with the downhill bikes).</p> <p>On another note, I will take up your offer to have the Maui HPPA board go the Summit with you and have lunch. Let me know when would be a good time for you and I will contact the other Maui board members.</p> <p>Malama pono,</p> <p>Lori Sablas, Director of Po'okela Kā'anapali Beach Hotel 2525 Ka'anapali Parkway Lahaina, Maui, HI 96761 Bus:(808) 667-0217 Fax:(808) 667-0132 lsablas@kbhmaui.com www.kbhmaui.com</p>	104
MT1000	Miscellaneous Topics: General Comments	<p>As the only local hiking tour company holding a CUA for the park, Hike Maui, is committed to helping to preserve the environment within the park and the entire island, we do our best to assist park staff as needed, and we require very little supervision from the park staff. We are a low-impact operation. We aim to contribute more than we receive.</p> <p>Sincerely, Ken Schmitt Hike Maui ken@hikemaui.com</p>	105
MT1000	Miscellaneous Topics: General Comments	<p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>- 1. CUA priority should go to locally owned and operated businesses to create community partnerships to preserve & protect the park.</p>	106

MT1000	Miscellaneous Topics: General Comments	<p>Comments on: Haleakala National Park Draft Commercial Services Plan</p> <p>Aloha Superintendent Creachbaum and Staff:</p> <p>Thank you for developing the Draft Commercial Services Plan for Haleakala National Park and for allowing the public to provide comments.</p> <p>The Maui Hotel & Lodging Association (MHHA) is the legislative arm of the visitor industry in Maui County. Our membership includes over 140 property and allied business members all of whom understand the importance of supporting a healthy & vibrant visitor industry. Collectively, MHHA's membership employs over 10,000 local residents.</p> <p>As with most National Parks and scenic areas in Hawaii, management has many challenges related to oversight, users, care & upkeep of our beautiful icons. For the visitor industry, we have a vested stake in being good stewards of our precious resources and we take this role very seriously as our industry relies upon the beauty of our islands in order to remain viable in a highly competitive market.</p> <p>In regard to fees, we fully support the concept that fees should pay for the maintenance of our park. This could easily be realized through permit costs or admission fees. Our role should not be to limit business, but rather manage it to the benefit of all.</p>	109
MT1000	Miscellaneous Topics: General Comments	<p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>Approximately ten years ago, Maui Stables submitted documentation to add a second corridor with additional trails. Subsequent letters were sent by M.S. with no reply from the park. The CSP needs to address the expansion of horseback trails in the interest of bringing more people, including ADA, to the interior of this natural wonder. Considering all other vehicles capable of doing this, the horse is the most environmentally sound.</p> <p>Thank you for your attention to this matter, Robert Jensen Ruthie Jensen</p>	110
MT1000	Miscellaneous Topics: General Comments	<p>2. Do you have any suggestions for improving or strengthening the NPS preferred alternative? If so, what are they?</p> <p>More stairways with railings over difficult climbing areas, more bridges over deep crevasses, and more areas accessible to handicapped people including the elderly and overweight. More horse trails and more accessibility to horseback rides into the park for these people who cannot walk that far.</p> <p>3. Do you have any other comments related to this draft commercial services plan?</p> <p>The park at Kipahulu is simply no handicap-access friendly nor does it allow for reasonable number of horse trails into the park natural wonders. The Kipahulu park is severely deficient in providing visitors with reasonable safe access to the interior.</p>	111

ON1000	Other NEPA Issues: General Comments	<p>that these are the best options that the CSP offers.</p> <p>The way the CSP is written, we can assume that it is Alternative B that has already been selected as the route HNP will go. Yes it says preferred, but the other alternatives are so off the wall and slandered that they've put Alt. B in the perfect position to be accepted, even if it is still way off the mark.</p> <p>The problem I have is that this plan does not offer any real compromise. It's one extreme or another. The preferred plan will essential put 25+ companies out of business. Maybe there are some workarounds, but the result of this alternative will drastically change the operations of these companies, and even force many of them to go out of business. 15 companies, hundreds of employees out of work, all because Park officials feel it will be easier to manage than the other alternatives.</p> <p>Here's an idea, the other alternatives are outrageous. Alternative A. No change. No change would actually mean no more new CUAs. Current holders retain their CUAs, and their ability to renew their CUAs. But in the plan this Alternative is portrayed as a NO LIMIT, NO GUIDELINES, NO RULES, Total Anarchy and Chaos alternative. Why would they act this way? It doesn't have to be that way, and the park does not present the options that would make Alt. A more appealing.</p>	1
ON1000	Other NEPA Issues: General Comments	<p>I just read the article in the Maui News regarding the changes to tour operations in Haleakala National Park. I also read the CSP. I would like to comment on one subject for now. I noticed that to best serve the park, the Maui News article and portions of the CSP are worded in such a way to make Alternative A an undesirable option. Specifically, it is mentioned in the Maui News and in the summary of the Alternatives that there will be no limit on Commercial Services in the Park. This is UNTRUE! In the CSP itself, it is stated that it is the National Parks are LEGALLY required to limit Commercial Services.</p> <p>Page 17 of the CSP states "National Park Service is prohibited by law from issuing more commercial use authorizations than are consistent with the preservation and proper management of park resources and values."</p> <p>Again on page 20 "A further legal restriction is placed by 16 USC section 5996-no more commercial use authorizations may be issued than are consistent with the preservation and proper management of park resources and values."</p> <p>The park not only has the ability, but has the responsibility to limit CUAs. So there is NO option that allows UNLIMITED commercial services.</p> <p>This is one of many contradictions within the Commercial Service Plan.</p> <p>Thank you.</p>	13
ON1000	Other NEPA Issues: General Comments	<p>My name is Lewis Upfold, I am the manager of Haleakala Bike Company. I have thoroughly read through the CSP several times, and have a thousand of things to comment on the plan itself. Contradictions, fallacies, vague statements, biased analysis, often times self serving wording. Our company will be writing up a detailed report of our findings, and present them to the park when thoroughly compiled.</p>	18

ON1000	Other NEPA Issues: General Comments	<p>The timing of the issuance of 'guidelines' for commercial services was not well defined in the public hearing and I would recommend an expedited issuance of the same.</p> <p>Also, the implementation process appears to be extremely lengthy and I suggest it be started as soon as possible and completed as quickly as possible. My thought is that a governmental (NPS) process would take way too long and that contracting out the implementation would be a much faster and ultimately have a greater revenue impact (as I understand the issuance of annual permits is less efficient and generates less revenue than a contractual arrangement). The contracting business would have to have your oversight, of course.</p>	31
ON1000	Other NEPA Issues: General Comments	<p>We have read through the CSP draft numerous times and despite several items that we disagree with, and the bad science that the conclusions are based upon, we find it to be thorough and enlightening.</p> <p>We applaud the efforts of Haleakala National Park in ensuring that the Park is a pleasant place to visit. The hard work put into devising this CSP draft is obvious, and we all hope the results are beneficial. Whatever decision is made, it is important to express the concern of how much time is needed to adjust to new operations. Whether our company is awarded a concession or not, there must be suitable time in order to adapt and make modifications to business operations. For those affected enough to close their business will need enough time to do so. Any lease or contractual agreements currently in effect will need to play its course during this period as well. We suggest a minimum 3 years from the time the decision is made. At least 3 years after January 1, 2013 is essential to make the necessary changes to our businesses.</p>	36
ON1000	Other NEPA Issues: General Comments	<p>3.It would be very helpful for the entire Haleakala tour in this industry if you give better details outlining the time frame of when changes will actually occur.</p>	42
ON1000	Other NEPA Issues: General Comments	<p>c. Minibuses at Kipahulu need to be evaluated for the number of visitors and their impact on natural and cultural resources, and for public safety due to narrow and winding roads along Highway 330.</p>	100

PN3000	Purpose And Need: Scope Of The Analysis	<p>Dear Ms. Creachbaum:</p> <p>The Draft Commercial Services Plan does not appear to cover taxicab service in the Park, which has been a subject of confusion for both taxi drivers and park personnel. You will recall that there is currently in effect a letter of understanding from you to me allowing taxis to enter the park on the same basis as other passenger cars for up to five visits per year.</p> <p>I suggest this policy be formalized in the Commercial Services Plan, or that the Plan specify that taxis are exempt from all commercial use provisions.</p> <p>This suggestion is based upon the following facts:</p> <ol style="list-style-type: none"> 1. Under Hawaii law a vehicle must have a permit from the Hawaii Public Utilities Commission in order to advertise tours. Taxis have only a Maui County taxi license. 2. There are approximately 250 taxis on Maui and passengers asking to be taken to Haleakala are few and far between for any one taxi. In 11 years taxi driving on Maui, I have encountered only 2 or 3 requests per year. In some years there were none. In one recent incident I was called to the Visitor Center by Park Rangers to transport a visitor group out of the park due to a family problem. 3. Passengers usually do not ask for a "tour", but simply "take us to Haleakala Crater". These visitors are typically hikers who intend to be in the crater for an extended period, or people who cannot drive a rental car due to disability, age, driver license issues, or fear of winding roads. 4. Since Maui County ordinances provide that the maximum number of passengers a taxi may carry is 7, the impact upon park resources cannot be greater than that of a typical private or rental minivan. Taxis should be viewed the same as rental cars for entrance to the park. <p>While taxi visits to the Kipahulu District are also rare, such visitors should be encouraged to pay the passenger car entrance fee rather than become non-paying walk-ins.</p> <p>Respectfully submitted,</p>	55
PN3000	Purpose And Need: Scope Of The Analysis	<p>The Department's review focused on natural and cultural resources, although the Department would like to commend the proposed changes that would bring beneficial effects to visitor experiences, public health and safety, socioeconomics, and Park operations. The Department's comments are as follows:</p> <ol style="list-style-type: none"> 1. On page 6, and as shown in Figure 2 page 9, the scope of the Plan is defined as the non-wilderness areas at the Haleakala Summit and at Kipahulu. To protect the natural and cultural resources where the non-wilderness Park lands extend south to the coastline the Department would recommend that the scope be increased to provide restrictions, or prohibition, on all commercial activities in these non-wilderness park areas: 1) along Highway 330 east of Kaupo, enclosing Alelele and Lelekea Streams, and 2) Pi'ilani Highway 31 west of Kaupo near Mamalu Bay. With commercial service and activities being reduced under Alternative 8, commercial service providers may expand tours to these areas, which would most likely have detrimental impacts to cultural and natural resources, and public safety. As discussed on page 130, Kaupo Gap is a traditional cultural property and eligible for listing in the National Register of Historic Places. 	100

PN8000	Purpose And Need: Objectives In Taking Action	Governments are often bogged down by bureaucracy & as a result are slow to react. Quick change only occurs when under siege by public outcry from a real or perceived threat. The 2005 Commercial Use at sunrise & 2007 safety stand down are great examples of quick change. From reading the CSP and looking at the data, it would appear that most the negative symptoms within the park's jurisdiction regarding commercial activities have been eliminated as a result of these two actions.	34
PN8000	Purpose And Need: Objectives In Taking Action	<p>* P. 32, Paragraph 2 "As directed by NPS Management Policies 2006, the National Park Service strives to minimize the short- and long-term, environmental impacts of development and other activities through resource conservation, recycling, waste minimization,..."</p> <p>Although the C.S.P. indicates that this topic was dismissed from further analysis, natural resources in the park are always a concern. Very often there are signs at the park entrance gate directing visitors to use the restroom facilities at Park Headquarters ude to a water shortage at the Visitor Center (9,740' elev.)</p> <p>At present, twelve of the motor coaches at Polynesian Adventure Tours are equipped with onboard, self-contained toilets. Only three are currently in service, since most of our runs are very short and toilets are generally not an issue. However, the toilets are all functional. All that would be needed is for the fresh water tanks to be filled and the sanitation chemicals added. A motor-coach with a working toilet on board could have an impact the water usage in the park by reducing the number of people that use the toilets in the park. In addition, the motor-coaches remove the waste material from the park when they drive away. This would result in less effluent impacting the septic systems in the park.</p>	102
PN8000	Purpose And Need: Objectives In Taking Action	<p>*P. i, Paragraph 3. "...reduce the number of commercial visitors in the park to ensure that park resources are protected and that safe, high quality experiences are available to all visitors. "</p> <p>Our current training regimen for all employees entering the park is based on the C.U.A. for the current year. Each year, when the new C.U.A. is finalized, we amend our training to reflect any changes.</p> <p>Safety is a key factor in our training so our guests can enjoy a safe and high-quality experience in the park (Refer to "Attachment A" Training Outline). We train our drivers to discuss medical concerns, e xtreme weather conditions, challenging driving conditions and varied trail conditions in the park.</p> <p>We instruct our passengers about the need to protect of park resources. (Refer to "Attachment A" Training Outline and the current C.U.A., P-1, Paragraph 5) I tell them, "Take nothing but photos, leave nothing but footprints... but only where I tell you it's okay to leave footprints!"</p>	102

PN8000	Purpose And Need: Objectives In Taking Action	<p>*P. i, Paragraph 3. "...reduce the number of commercial visitors in the park to ensure that park resources are protected and that safe, high quality experiences are available to all visitors. "</p> <p>Unfortunately, there are those who would not be able to visit the park without our assistance. They would not be able to have the, "...high quality experiences..." that are available to all other visitors. A person with a personal mobility device, such as a wheel-chair or powered scooter may not be able to get to the park without a specially equipped vehicle.</p> <p>Commercial transportation companies are mandated by federal regulations to maintain such vehicles. Our fleet includes two motor coaches capable of transporting two wheel-chairs or two scooters each. A physically challenged visitor may not have the resources to rent a vehicle equipped with a wheel-chair lift. A lift-equipped commercial vehicle may be the only way they would be able to visit the park. A single motor-coach can still remove as many as twenty cars from the road by tnasporting fifty-one passengers in addition to two people in wheel-chairs or scooters.</p> <p>There are also visitors who can walk up and down stairs into a motor-coaches [sic] but need to bring their chair or scooter with them to the park. Our coaches can carry several scooters and chairs in their cargo-bays. I once transported two wheel-chair-bound clients, five ambulatory clients with chairs/scooters in the cargo bay for a total of 50 people on board. (This was to a luau but could easily happen on a park tour.)</p>	102
PN8000	Purpose And Need: Objectives In Taking Action	<p>When I reviewed the proposed Commercial Service Plan (C.S.P.) for Haleakala National Park (H.N.P.), I made the following observations. These are in no particular, logical order, but reflect the order in which I read them in the C.S.P.</p> <p>* Any "Bullet points" identified in this manner refer to a "P" page number in the Commercial Services Plan (C.S.P.) and "Paragraph" paragraph on that particular page. -> Any "Bullet point" identified in this manner simply refers to a point I wish to make relative to the citation that precedes the bullet.</p> <p>*P.i, Paragraph 3. "...reduce the number of commercial visitors in the park to ensure that park resources are protected and that safe, high quality experiences are available to all visitors. "</p> <p>Reducing the number of ocmmerical visitors to the park will not necessarily reduce the number of visitors to the park to any significant degree. Approximately 80% of the visitors to the park are not on commercial vehicles. Of the commercial visitors to the park, a majority would be capable of driving to the park if commercial services are limited.</p>	102
PN8000	Purpose And Need: Objectives In Taking Action	<p>It seems that many of the issues to limit and reduce have already been resolved in the 2005 and 2007 decisions on safety. We urge you to consider a management plan that will not shut down businesses and lay off our residents.</p> <p>Thank you for allowing the comments. Sincerely, Carol Reimann Executive Director</p>	109

PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	<p>2. In reference to excerpts from page 25 regarding climate change and sustainability and page 27 regarding preservation of soundscapes, although the draft states that " ... the full extent of the effects of climate change on resources and visitor experiences is not known," and that " ... commercial services have a negligible effect on greenhouse gasses and climate change," I strongly believe we are able make a positive impact in these areas:</p> <p>a. We have discussed previously that running one Mini Bus is more environmentally friendly than running several cars. On a larger scale and in the same tangent, with a significant sized group traveling together it still takes 3 Mini Buses to accommodate the amount of passengers that just 1 Motor Coach can. Running the three Mini Buses on a 100 mile trip would result in an approximate 12 gallon fuel burning increase and approximately 30% in increased emissions. I have done an analysis of the types of SIV (seat-in-vehicle or individually ticketed) reservations we received for Haleakala in May of 2012; our Sunrise Tour brought a total of 777 guests to the Summit, 697 of whom traveled alone or as a couple, and 80 passengers traveled as families. 90% of the guests would have traveled to the Park in very small numbers, while only 10% traveled in a group. This saved an approximate 484 rental cars from traveling to the Summit. Our Day Tours brought a total of 291 guests to the Summit, 237 of whom traveled alone or as a couple and 54 passengers traveled as families. 80% of the guests would have traveled to the Park in very small numbers, while only 20% traveled in a group. This saved approximately 167 rental cars from traveling to the Summit. This not only has a positive air quality effect,</p>	56
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	<p>* P. 32, Paragraph 2 "As directed by NPS Management Policies 2006, the National Park Service strives to minimize the short- and long-term, environmental impacts of development and other activities through resource conservation, recycling, waste minimization,..."</p> <p>Although the C.S.P. indicates that this topic was dismissed from further analysis, natural resources in the park are always a concern. Very often there are signs at the park entrance gate directing visitors to use the restroom facilities at Park Headquarters due to a water shortage at the Visitor Center (9,740' elev.)</p> <p>At present, twelve of the motor coaches at Polynesian Adventure Tours are equipped with onboard, self-contained toilets. Only three are currently in service, since most of our runs are very short and toilets are generally not an issue. However, the toilets are all functional. All that would be needed is for the fresh water tanks to be filled and the sanitation chemicals added. A motor-coach with a working toilet on board could have an impact the water usage in the park by reducing the number of people that use the toilets in the park. In addition, the motor-coaches remove the waste material from the park when they drive away. This would result in less effluent impacting the septic systems in the park.</p>	102

PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	<p>*P. 24, Paragraph 3. "Insufficient/Inaccurate Information Provided by Some Commercial Service Providers "Although many commercial services providers take pride in providing accurate informatino to their clients, insufficient or inaccurate information is being given to visitors by some commerical services providers."</p> <p>If there is incorrect information being disseminated, it must be stopped. The offending company and its employees must be disabused of that incorrect informatino. Our company strives to maintain open lines of communication. We not only welcome, we encourage N.P.S. personnel to inform us any time any of our staff causes any misinformation to be transmitted to any visitor to the park. We recognize that we owe our clients and any visitor to the park the very highest quality service. INdeed, our company goal (it's printed on the back of the motor-coach that I drive, #505) is to provide the highest quality tranportation service. We believe that our guests walk away from our tours more informed and aware of those things Hawaiian than the average visitor to the park who may or may nor read any of the posted signage and informational brochures provided by the park. We are very proud of the quality of the material provided by the N.P.S. in the form of brochures and informational displays. As a result, we do not merely expect our visitors to avail themselves to the information presented by the park, we heartily encourage them to read all the signs, look at all of the displays and read the park brochure. We believe that there is great information available and we want our clients to know it. I think the average visitor takes a park brochure, stuffs it in a camera bag and saves it as a souvenir, never to look at it again. How sad.</p>	102
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	<p>*P. 28, Paragraph 5 "Public Health and Safety" This topic was retained because the health and safety practices of commercial use groups can have an impact not only on the clients using the service, but also on other visitors in the area. Health and safety of visitors is one of the major reponsibilities of the National Park Service. In particular, the National Park Service has a responsibility to identify public safety hazards and risks and to determine how and to what extent these risks can be mitigated."</p> <p>There seems to be a common misconception that buses are dangerous. According to data from the National Highway Traffic Administration (N.H.T.S.A.), buses appear to be the safest mode of highway tranportation. The most recent data I could find was compiled from traffic accidents occurring in 2009. (Refer to Attachment C)</p> <p>-> Of the 9,534,443 accidents in 2009, buses were involved in 57,576 which is appoximately 0.6% of the total number of incidents.</p> <p>-> Of the 40,840 traffic fatalities, buses were involved in 221 or approximately 0.5% of the total number of incidents.</p> <p>-> Of the 2,642,487 accidents involving injury but no fatality, buses were involved in 9.968 or approximately 0.4% of the total number of incidents.</p> <p>-> Of the 6,851,117 accidents involving property damage and no injuray or fatality, buses were involved in 47,387 or about 0.7% of the total number of incidents.</p> <p>Please note that the percentages are all less than one percentage point and closer to one-half-of-one-percent! I should also point out that the figures do not include accidents involving motorcycles. I suspect that you will find that motorcycle accidents almost always involve injury or death.</p>	102

PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	<p>*P. 24, Paragraph 2 Public Health and Safety "... parking was occurring outside of marked stalls, in traffic lanes, on road shoulders and in other locations."</p> <p>Parking outside of marked stalls, in traffic lanes, on road shoulders is still occurring. If there were fewer cars in the park, this would be reduced. Again, a mini-bus takes the space of two cars but can transport the passengers of six-to-twelve cars.</p> <p>*P. 24, Paragraph 2, Public Health and Safety "The resulting congestion at the Haleakala summit during sunrise created additional public health and safety and visitor protection concerns involving overflow into critical habitat area, off-trail areas, and potentially unsafe cliff areas."</p> <p>An uninformed visitor to the park may not be aware of the health and safety concerns at high elevations or in tropical climates. Our drivers are trained to inform our passengers of these hazards. They are also trained to instruct their passengers about walking about the park in the darkness and about icy trails and pathways. They are experienced enough to know what areas are dangerous and what should be avoided, especially during hours of darkness.</p>	102
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>The bottom line is that things are not THAT bad as is right now. Not to the point that you need to clean house and put 15 established, family owned, local businesses out of business. CUAs can be limited. CUAs can be managed.</p> <p>Please consider these options. I am disappointed with the alternatives as they don't present a true study of the available options. Do not put these companies out of business. The Park is essential to their activities, provides a service to tens of thousands of visitors a year, provide important information about the park, rules, ecosystem, environment that they wouldn't otherwise receive without commercial services, and they are an important part to the local community and surrounding areas. Dozens of companies, hundreds of jobs, and millions of dollars for the local economy are at stake here.</p>	1
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>I don't understand the focus on the bike rides in the park. I thought they haven't done bike rides in the park since 2007. And as far as I can tell, they have done relatively well without BIKING in the park. And things have been calm as can be, in regards to the biking down Haleakala debate. What I do know is that all those bikers I see coming down past my house, and that is A LOT of them, did get a tour of Haleakala National Park through the bike companies. I wonder if they would go up on their own if not for the bike adventure that follows... Well it would be a shame if all those people didn't get exposed to the park at all. All I'm saying is that it seems the bike companies can survive without biking in the park, I'm not sure that they would without touring the park and seeing the crater in a vehicle. That would be detrimental to Maui visitors, the upcountry community, and Haleakala National Park itself.</p>	14

SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>That's my back story with the company. As for who I am now. HBC has allowed me to grown and flourish as a person. From a fresh out of a failed college attempt, to a manager of this company, I was able to build a family because of the support and stability HBC and Ben Hall has given me. The company provides the sole financial income for my family, as my wife is a stay at home mother for our 3 children. Austin(3), Brooklynn (18 months), and our newborn Jordan who was born June 13. I am able to support my family through this company, and fear that without this company I wouldn't be able to do so. Finding a job is not easy these days, and I thank God EVERY day that I am fortunate enough to have the one that I do. Not only do I get a consistent pay check, but Ben also provides insurance for me and all of my family. He does the same for all his employees. We just got our first Bill from Maui Memorial Hospital for Jordan's birth. Over \$10,000! This is for the first of many doctor bills coming in. But luckily through insurance, covered by Haleakala Bike Co., we will pay next to nothing. We cannot afford to have a bill that big over our heads. With my 3 children and a single income home, we will struggle to provide the basic necessities for our family.</p> <p>The personal financial hardship my family would face would be devastating and the effects will last for a long time. Yes I may be able to find a job one day. But when? And will that job support me like Haleakala Bike Co. has? And will I enjoy it ass much as I do this one. If you asked me why I enjoy my job, my answer would be simple. Because it makes people happy. People enjoy what we do for them. And from the responses we receive on tripadvisor, yelp, facebook, or just personal comments, we do a good job all around. We provide them a fabulous tour of Maui AND of Haleakala National Park. This is something myself, and the company as a whole prides itself on. This is also something that customers are overwhelmingly pleasantly surprised with. Feedback about the tour, information shared, guidelines given has been nothing but positive. And this is comments about the tour prior to the bike ride, which they also have extremely positive things to say about.</p>	18
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>Both the Haleakala National Park Summit and the Hana Road are very important to the Islands economy.</p> <p>Also, because all the land tour companies that provide Hana Tours leave at a different times, this helps with all the visitor experiences, having only one company provide tours would make it difficult to spread things out and provide the various places we visit to sustain a once a day influx of visitors. I could speak more about this but it would add another 3 pages. The same could be said for the Haleakala Summit, all go to different places for Lunch, Breakfast, vehicle maintenance and repairs, etc.</p> <p>Not having a Concession Permit for Kipahulu would become a hardship for some of our employees, it is one of the most requested stops when visitors, agents travel companies' book our tours.</p> <p>We will survive no matter what the outcome is, it will just change the number of people we have in our employ. Since we have great people, my responsibility will be to "DO MY BEST" to provide them with meaningful employment, and a way to practice their culture.</p> <p>There are people who provide us with Breakfast, Lunch and other services that are small and local; they could not provide these services to a larger company. Some are solely dependent on us to provide them a income. I realize that this is not the National Parks main concern, but it does lend itself to having different permits for the Summit and Kipahulu. At least I hope you understand that the decisions of a few will have a lasting negative impact on many.</p>	28

SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>Our main business is an intense five days on Maui Island hopping program for five to ten PAX. We show the guests almost every part of Maui. Haleakala summit is only a small part of that extensive experience. But if we can't show Haleakala summit, the program probably will end.</p> <p>If you want to go forward with your preferred Alternative B please keep in mind that tours will become more expensive. Let's say a foreign group of 55 PAX on board a cruise ship want to go up Haleakala. In the moment, one motor coach with a capacity of 57 PAX is fine. If you ban motor coches, the group will need three mini-buses and three tour guides or interpreters.</p>	29
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>Due to elimination of the efficient motor coach tours, retail prices to the public for a commercial tour will increase.</p> <p>Restructuring 19 CUAs to a bid process with 4 concessionaire winners will result with increased costs to all but the park via reduced work load. This alternative will make the park more money (bid = more money, that's how it's always done) and also reducing work load on the park's administration.</p> <p>Another benefit to this change is longer contract terms for those fortunate enough to "win" the concession bid. Closure is eminent for the losing businesses. This will lead to economic loss with a multiplier effect into the local community. Are longer contracts, reduced cost and work for the park worth that downside?</p>	34
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>Akina Aloha Tours is not a high volume user of Haleakala National Park at Sunrise. As such, we have experienced first-hand the seemingly arbitrary nature of the decision-making process in Washington D.C. In an attempt to control the over-crowding and congestion, it was decided that the simple solution was to limit ACCESS. Of the four Tour Bus Companies on Maui, Akina Aloha Tours is the only one EXCLUDED from the Crater at Sunrise. How is this fair or equitable? Because we did not have any Sunrise business during a specific time period of the Park Service's choosing Akina was eliminated from Sunrise access? This was a VERY simple solution for the person-in-charge, but a devastating decision for Akina Aloha Tours.</p> <p>We have been good corporate partners with the Park and have readily complied with all the safety regulations that the Park Service requires of our equipment and drivers. Yet we cannot bring an occasional group to the Crater at Sunrise.</p> <p>Our Concern: Our main concern and over-riding issue is one of ACCESS. We want continued access to Haleakala when the need arises for us. Haleakala National Park is a precious resource that needs to be nurtured and SHARED. We are primarily involved in the Corporate & Leisure Group Markets, and do not offer a daily F.I.T. Tour. That means we will be occasional users of the Park and will have a much lower impact, as a company, than a daily or high volume user. This Low Volume Usage should not be used as Criteria to determine our FUTURE ACCESS to Haleakala at Sunrise, or any other time of day.</p>	40

SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>1) Going from 19 CUAs to 4 Concession Contracts: a) 7 of the 19 CUAs (are road based with bicycle option) i) As per Table 18 page 120 and page 191 - 68% of their total revenue is attributable to the Park. ii) As per table 13 page 102-103, these 7 CUAs provide 32% of the "#clients summit Only." iii) As on page 121 and 191, "one company reported nearly all revenues generated from tours that visit the park" b) Forcing these 7 CUAs (road based with bicycle option) to compete with the other 12 CUAs (who attribute 23% or less of their revenue to the Park) for the 4 Concession Contracts is extremely harsh and will put most (if not all of them) out of business.</p> <p>3) It is agreed that the tour guide education program suggested would be beneficial to all - it must be remembered that it will again be the business owners that will bear the brunt of the cost of this education. Not only by having to pay their employees to attend the classes, but also by paying the cost of the Park educators through the raised fees to the Park or through franchise fees. This is yet another expense the business owners must bear that is completely controlled by the Park/Government.</p>	43
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>Negative impacts on commercial groups, without better attempts at controlling private vehicle use seem unfair. They constitute a valuable source of meaningful jobs to the "local" as well as native population, especially in this time of lowered opportunity.</p> <p>Mahalo ng</p>	44
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>The National Park represents a large presence in our neighborhood; the National Park can contribute to the economic welfare of our community by promoting partnerships with solid local entrepreneurs like Maui Stables.</p>	65
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>August 21, 2012</p> <p>Mr. Rick Moore Business & Revenue Program Specialist Haleakala National Park</p> <p>Dear Mr. Moore,</p> <p>Hawaii's economy is dependent on the tour industry many of the Hawaii residents and businesses are also very dependent on the tour industry. As Haleakala is one of the main points of attraction for visiting travelers to Maui, to restrict tour operators and related businesses from being able to conduct tours into Haleakala National Park would greatly affect the livelihood of the business as well as their employees in this already tough economy.</p>	94
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>By reducing the number of operators, the plan will have a huge impact to the valuable services that these commercial businesses provide and will shut down many businesses. An unintended consequence will certainly include the loss of business and precious jobs for numbers of our local residents. It will put many people out of business at a time when we are trying desperately to get people back to work.</p>	109
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	<p>1. What aspects do you like about the NPS preferred alternative in this draft commercial services plans?</p> <p>Plan B. I understand the need for native Hawaiians to conduct cultural practices, and to close the park for several days of year, but to eliminate motor coaches from the park will have a devastating effect on our economy. I don't think the bus companies will be able to survive if they are ban from the park. Many foreign tourist will miss out on the opportunity to see the best experience of coming to Maui.</p>	112